

PREA Facility Audit Report: Final

Name of Facility: Atlanta City Detention Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 06/25/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Debra D. Dawson	Date of Signature: 06/25/2022

AUDITOR INFORMATION	
Auditor name:	Dawson, Debra
Email:	dddawsonprofessionalaudits@gmail.com
Start Date of On-Site Audit:	06/07/2022
End Date of On-Site Audit:	06/08/2022

FACILITY INFORMATION	
Facility name:	Atlanta City Detention Center
Facility physical address:	254 Peachtree Street Southwest, Atlanta, Georgia - 30303
Facility mailing address:	

Primary Contact	
Name:	Tina Wright
Email Address:	Twright@atlantaga.gov
Telephone Number:	404-856-8128

Warden/Jail Administrator/Sheriff/Director	
Name:	Elder Dancy
Email Address:	eldancy@atlantaga.gov
Telephone Number:	404-865-8063

Facility PREA Compliance Manager	
Name:	Carsandra Wiggins
Email Address:	Ckwiggins@atlantaga.gov
Telephone Number:	

Facility Health Service Administrator On-site	
Name:	Tina Wright
Email Address:	Twright@atlantaga.gov
Telephone Number:	404-865-8128

Facility Characteristics	
Designed facility capacity:	1314
Current population of facility:	44
Average daily population for the past 12 months:	45
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	17-99
Facility security levels/inmate custody levels:	Minimum
Does the facility hold youthful inmates?	Yes
Number of staff currently employed at the facility who may have contact with inmates:	150
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	9
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	4

AGENCY INFORMATION	
Name of agency:	Atlanta Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	254 Peachtree Street SW, Atlanta, Georgia - 30303
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Tina Wright	Email Address:	Twright@atlantaga.gov

SUMMARY OF AUDIT FINDINGS	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
Number of standards exceeded:	
0	
Number of standards met:	
45	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-06-07
2. End date of the onsite portion of the audit:	2022-06-08

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Grady Rape Crisis Center Director, Grady Rape Crisis Center Project Coordinator, Facility Victim Advocate, and the JUST Detention International

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1314
15. Average daily population for the past 12 months:	50
16. Number of inmate/resident/detainee housing units:	22
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	59
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	0
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0

40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	1
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	150
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	9
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	Facility staff identified volunteers have not been approved for entry since March 2020 due to COVID-19.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	

Random Inmate/Resident/Detainee Interviews	
53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	16
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	All detainees housed at the facility had residential status of Atlanta, GA or surrounding area as the facility is a city jail.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	1
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	0

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/detainees.</p> <p><input type="checkbox"/> The inmates/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/detainees).</p>	<p>There were no detainees housed at the facility under the age of 23 years old during the site visit</p>
<p>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who identify as a physical disability housed at the facility. This was confirmed through observation and interviews with staff.</p>
<p>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who identify as a cognitive or functional disability housed at the facility. This was confirmed through observation and interviews with staff.</p>
<p>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who identify as Blind or have low vision, none was identified housed at the facility. This was confirmed through observation and interviews with staff.</p>
<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who identify as deaf or hard of hearing, none was identified housed at the facility. This was confirmed through observation and interviews with staff and the detainee population.</p>
<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who identify as LEP, none was identified housed at the facility. This was confirmed through observation and interviews with staff.</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input checked="" type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who identify as lesbian, gay, or bisexual, none was identified housed at the facility. This was confirmed through observation and interviews with staff.</p>
<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who identify as transgender, intersex, gay, lesbian, and/or bisexual at the facility during the site visit, zero was identified to include via self-identified during the interview process</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>There were zero reported allegations of sexual abuse reported for the facility</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>1</p>

<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Per a request for the selection of detainees who are placed in segregated housing for the risk of sexual victimization/who allege to have suffered sexual abuse, no such allegation was reported and/or identified. All detainees are assigned to a single cell and are directly supervised by staff. Per interviews with the Chief of Corrections and supervisory staff, the facility does not utilize segregated housing for such detainees. Additionally, no detainees were identified as such.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>The facility is a city jail where the detainees are transported there by the City of Atlanta Police Department due to minor misdemeanor charges. Eligible detainees have the right to complete a self-bond through their signature without paying funds that allows their release from custody within hours of their arrival after the completion of the booking. Therefore, the vast majority of detainees can be released within hours of their arrival.</p>

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>18</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>

Specialized Staff, Volunteers, and Contractor Interviews

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	19
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

<p>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</p>	<p><input type="checkbox"/> Agency contract administrator</p> <p><input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</p> <p><input checked="" type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</p> <p><input checked="" type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</p> <p><input checked="" type="checkbox"/> Medical staff</p> <p><input checked="" type="checkbox"/> Mental health staff</p> <p><input type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</p> <p><input checked="" type="checkbox"/> Administrative (human resources) staff</p> <p><input checked="" type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</p> <p><input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations</p> <p><input type="checkbox"/> Investigative staff responsible for conducting criminal investigations</p> <p><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</p> <p><input checked="" type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</p> <p><input checked="" type="checkbox"/> Staff on the sexual abuse incident review team</p> <p><input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation</p> <p><input type="checkbox"/> First responders, both security and non-security staff</p> <p><input checked="" type="checkbox"/> Intake staff</p> <p><input type="checkbox"/> Other</p>
<p>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>a. Enter the total number of CONTRACTORS who were interviewed:</p>	<p>1</p>

<p>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</p>	<p><input type="checkbox"/> Security/detention</p> <p><input type="checkbox"/> Education/programming</p> <p><input type="checkbox"/> Medical/dental</p> <p><input type="checkbox"/> Food service</p> <p><input type="checkbox"/> Maintenance/construction</p> <p><input checked="" type="checkbox"/> Other</p>
<p>83. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>The agency does not have a agency contract administrator other than the Business Office Personnel for financial services only at the facility. The local Atlanta Police Department conducts criminal investigations for the facility.</p>

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

<p>84. Did you have access to all areas of the facility?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
---------------------------------------------------------------------	-----------------------------------------------------------------------------

Was the site review an active, inquiring process that included the following:

<p>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>88. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>

Documentation Sampling

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?

Yes

No

91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

No text provided.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

92. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

93. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	1	0	1	0
Total	1	0	1	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

94. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/Court Case Filed	Convicted/Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

95. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/Court Case Filed	Convicted/Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

97. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	1	0
Total	0	0	1	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	There were zero reported allegations of sexual abuse at the facility.
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	1

107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
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Inmate-on-inmate sexual harassment investigation files

108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
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109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
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110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
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Staff-on-inmate sexual harassment investigation files

111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
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112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
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113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
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114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	There were zero reported allegations of sexual abuse reported for staff on inmate and/or inmate on inmate. There was only one reported allegation during the review period and that was one staff on inmate sexual harassment. This case was reviewed. There were no reported allegations of inmate on inmate sexual harassment reported.
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SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

<p>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
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Non-certified Support Staff

<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:</p>	<p>1</p>
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AUDITING ARRANGEMENTS AND COMPENSATION

<p>121. Who paid you to conduct this audit?</p>	<p><input checked="" type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
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Standards**Auditor Overall Determination Definitions**

- Exceeds Standard
(Substantially exceeds requirement of standard)

- Meets Standard
(substantial compliance; complies in all material ways with the stand for the relevant review period)

- Does Not Meet Standard
(requires corrective actions)

Auditor Discussion Instructions

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed PAQ 2. ACDC 700-04 Administration and Management 3. ACDC #400-13-01 Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities 4. ACDC #400-13 Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities Chapter – Care 5. ACDC Organizational Chart 6. Interviews: <ol style="list-style-type: none"> a. ACDC PREA Coordinator b. ACDC PREA Compliance Manager <p>115.11 (a) In accordance with City of Atlanta Department of Corrections Standard Operation Procedures #700-04, the City of Atlanta Department of Corrections has established a standard of zero tolerance for sexual abuse, sexual activity, sexual harassment, and staff sexual misconduct. It is the policy of the City of Atlanta Department of Corrections to promote and maintain a work environment that is free from harassment. Harassment of any type, whether verbal, physical or environmental, will not be tolerated in the workplace and appropriate corrective or disciplinary action will be imposed against culpable employees.</p> <p>In accordance with the City of Atlanta Department of Corrections Standard Operation Procedures #400.13, the purpose of this policy is to provide employees with the proper guidelines for detecting, reporting, managing and preventing detainee/inmate sexual assault, sexual activity and staff sexual misconduct.</p> <p>In accordance with the City of Atlanta Department of Corrections Standard Operation Procedures #400-13-01, the City of Atlanta Department of Corrections has a zero-tolerance policy toward all forms of sexual abuse and sexual harassment. It is the policy of City of Atlanta Department of Corrections to provide a safe humane, appropriately secure facility environment, free from the threat of sexual assault, sexual activity, and sexual misconduct for all detainees, while in custody; these acts seriously reduce the department's ability to fulfill its mission to protect the public. The Chief of Corrections is responsible for the implementation of the policy. However, all supervisors are responsible for (a) monitoring staff compliance with this policy; b) monitoring prevention and detection efforts; c) monitoring jail cultures (i.e. racial tension, gang activity, identification and monitoring of sexual predators); d) monitoring safety issues for vulnerable detainees/inmate and fostering a professional environment to include striving to eliminate sexually oriented jokes, flirting, sexual conversations, sexual harassment and profanity.</p> <p>115. 11 (b) Pursuant to #400-13-01 The City of Atlanta Department of Corrections will employ or designate an upper-level PREA Coordinator with the sufficient time and authority to develop, implement and oversee agency efforts to comply with the PREA standards at the City of Atlanta Department of Corrections.</p> <p>115.11 (c) Although the facility is an independent facility that does not require the assignment of a PREA Coordinator, the ACDC has assigned both a Facility PREA Compliance Manager and a PREA Compliance Manager. Staff assigned to these positions work closely together in the development, elimination, and monitoring of the facility's compliance with each of the PREA standard provisions. The Professional Standards Chief of Staff holds the position of the PREA Compliance Manager. The PREA Coordinator holds the position of the Clinic Services Manager (Director of Nurses). Both were selected for an interview by the auditor.</p> <p>Per the ACDC Facility PREA Compliance Manager (PCM), as the Professional Standards Chief of Staff, she is responsible for the assurance of compliance with all state, city and federal accreditations within the ACDC to include PREA. Monitoring of the PREA standards is a daily function of her duties. Upon identifying areas of concerns in meeting compliance, she immediately addresses them while working with Facility Commander and Chief to apply corrective actions.</p> <p>An interview was conducted with the ACDC PREA Coordinator. She stated, she always ensures her duties as the PREA Coordinator are completed in accordance with each standard provision. She and the ACDC PCM maintains an open line of communication in maintaining compliance, and report directly to the Chief of Corrections at the facility. She added, upon identifying any concerns, the concern is addressed immediately that may include providing training to staff, scheduling</p>

meetings to develop corrective action plans, and further evaluation of existing policies and procedures.

Based on the review of ACDC policies identifying and detailing its zero tolerance, ACDC organizational charts, the facility's assignment of both a Facility PCM and Facility PREA Coordinator, interviews with the PCM and PREA Coordinator, ACDC meets all provisions of the standard.

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <p>1. ACDC Completed Pre-audit Questionnaire (PAQ)</p> <p>Interviews:</p> <p>a. ACDC PREA Coordinator</p> <p>ACDC is a public agency. The facility has not entered into a contract for the confinement of its inmates with private agencies or other entities including other government agencies. However, ACDC did enter into a contract for the confinement of ICE immigrants that was terminated in 2018. The contract ended abundantly in 2018 within the contract period. All immigrations held for ICE was removed.</p> <p>Based on the review of the PAQ, interview with the ACDC PREA Coordinator and observation during the on-site visit, ACDC meets all provisions of the standard. ACDC has not entered a contract for the confinement of its inmates with private agencies or other entities.</p>

115.13	Supervision and monitoring
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 331 1189 873" style="list-style-type: none"> 1. City of Atlanta Department of Corrections PAQ 2. City of Atlanta Department of Corrections 400-13-1 3. City of Atlanta Department of Corrections Regular Review of Staffing Requirements 700 - 40 4. City of Atlanta Department of Corrections Annual Staffing Plan 5. Documented Unannounced PREA Rounds 6. Observation during site visit 7. Interviews: <ol data-bbox="240 730 627 873" style="list-style-type: none"> a. Chief of Corrections b. ACDC PREA Coordinator c. ACDC PREA Compliance Manager <p data-bbox="240 904 1465 999">115. 13 (a) (b) (c) (d) In accordance with policy 400-13-1 Plans will be developed to protect inmates against sexual abuse. The plan will provide for adequate staffing levels and video monitoring where appropriate. When the facility is unable to comply with the staffing plan, documentation and justification will be made.</p> <p data-bbox="240 1025 1453 1088">The staffing plan will be reassessed annually, or where necessary to determine if changes need to be made related to the number of staff or monitoring technologies. The reassess will be done with consultation with the PREA Coordinator.</p> <p data-bbox="240 1120 1469 1281">In accordance with Regular Review of Staffing Requirements 700 – 40, Each Division Head, along with the PREA Coordinator will evaluate divisional operations and propose operation al improvement within allocated resources at the time of budget preparation. Consideration will include realistic coverage for all essential posts the facility's deployment of video monitoring systems and other monitoring technologies and coverage required for training based on the department legal mandates, mission, strategic plan, and shift relief factor.</p> <p data-bbox="240 1308 1449 1370">Each Division Head will be prepared to present the Chief with a written or oral presentation for staffing requirement s and attendant justification sat each Budget and Planning Committee meeting.</p> <p data-bbox="240 1402 1485 1527">The Budget and Human Resources (HR) Divisions will conduct an evaluation process, including consideration for existing needs, staff suggestions, and recommendation s, as well as current and projected plans, and goals for the department. This evaluation will be conducted in association with the established budget submission schedule for the department and updated strategic plan.</p> <p data-bbox="240 1559 1474 1621">The Human Resource Unit will prepare and submit an annual report to the Chief, prior to the annual budget preparation and submission program, summarizing the composition of the departmental work force relative to the affirmative action goals.</p> <p data-bbox="240 1653 1485 1742">On a continuous basis, the Section/Unit Commanders will advise the Division Heads of the need for additions or modification to the authorized personnel strength. The Division Heads will review such requests and if appropriate in their views, submit corresponding recommendation to the Chief for consideration.</p> <p data-bbox="240 1774 1385 1836">The facility presented the most recent annually reviewed staffing plan dated June 1, 2022. The staffing plan review documented the review of all elements noted in the standard provision</p> <p data-bbox="240 1868 1433 1993">The following staff acknowledged the review of the staffing plan: Chief of Corrections, Administrative Service Division Commander, Facility Commander, ACDC PREA Coordinator, ACDC PREA Compliance. In addition to the review of the staffing plan annually, staff review and discuss it during their weekly meetings held every Wednesday. Meeting minutes documents the reviews.</p> <p data-bbox="240 2024 1490 2150">Per an interview with the Chief of Corrections, the review of the agency's staffing plan is ongoing, not just annually. He and his staff meet every week with the support of the human resource and other department heads who serve as subject matter experts when discussing the elements which are identified within the PREA standards that includes the staffing levels to provide a safe workplace for staff and safe environment for the detainee population. This includes the ensuring sufficient staff</p>

are hired and staffed during all shifts. He has open approval to hire overtime as needed to fill all vacant positions and have given open authority to the ACDC Commanders (supervisors) to do so. Legislation has approved the agency to bring back experience retired employees who must still go through the complete background checks and medical clearances for consideration. However, this has assisted in the hiring process and the decrease in overtime. The human resource staff conducts a pay scale study in comparison with the local area with various agencies to determine the difference in salaries in order to compete with others for new hires. His goal is to increase the hiring of sworn officers and decrease overtime. The facility maintains an average daily detainee population of less than 50. All required post is filled and never vacated. When a required post has been identified as vacate due to the assigned staff requesting an unscheduled leave of absence, other available staff are reassigned to fulfill the vacate post and/or overtime compensation will be approved to fill the position. No required post will be vacated at any time. The auditor randomly selected daily security roster for review of compliance with the staffing plan. The review confirmed all required security post where detainees were assigned were manned in accordance to the required assignments. Female staff only are assigned to the female housing units. Male and female staff are authorized to provide coverage in the male housing unit.

The auditor reviewed the housing units' logbooks beyond the 12-month review period for confirmation of unannounced PREA rounds. These rounds were documented as "PREA rounds" within each housing unit logbook and by various higher-level ranking supervisors.

Policy states supervisors will go on unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Staff members are prohibited from alerting their colleagues that these rounds are being conducted. Supervisory staff reported, their unannounced rounds are not conducted in a consistent manner and there is no set schedule of when rounds will be completed. Additionally, rounds are conducted by various supervisors throughout each shift. However, staff are made aware that they are prohibited from advising others that supervisory staff are conducting rounds. Each stated they have not encountered any concerns with staff advising others of their pending arrival, and upon any being identified, such action would be addressed accordingly.

Based on the review of the annual staffing plan that documents the consideration of all elements in provision, review of daily assignment security rosters, no deviation from the staffing plan, review of the staffing analysis, documented irregular supervisory rounds being conducted, and interviews with staff, it is determined that ACDC does meet all provision of the standard.

115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections(ACDC) Completed Pre-audit Questionnaire (PAQ) 2. ACDC #200-16 Security - Juveniles 3. Observation during site visit 4. Interviews <ol style="list-style-type: none"> a. Line staff who supervise youthful offenders b. Program staff c. ACDC PREA Coordinator <p>115.14 (a) (b) (c) In accordance with the City of Atlanta Department of Corrections 200-16, the policy establishes procedures for expediting the transfer of juveniles discovered after initial admission into the facility. Georgia State Law (O.C.G.A. 15-112-2 and 15-11-48) states the age of criminal majority is 17 and mandates the person 17 years old be housed in the jail if they have been adjudicated to stand trial as an adult. The City of Atlanta Department of Corrections does not hold persons charged with criminal offenses who are under the age of seventeen.</p> <p>The policy identifies a youthful detainee/inmate under the age of 18 shall not be placed in a housing unit in which the youthful detainee/inmate will have sight, sound, or physical contact with any detainee/inmate over the age of 17 through use of a shared dayroom space, shower, sleeping quarters or any other common area within the facility.</p> <p>When transporting/escorting a youthful detainee/inmate of the age of 17, staff shall maintain sight, sound, or physical separation between any detainee/inmates over the age of 17.</p> <p>The auditor requested a roster of youthful offenders who entered the facility during the 12-month review period of April 1, 2021, through March 31, 2022. Sixty-four 17-year-old youthful offenders were identified. Of the sixty-four, two were housed for two days, one was identified as being at ACDC for five days and one was identified as being at ACDC for 12 days. Sixty of the sixty-four youthful offenders were released on the day of arrival, and/or the following day after arrival within twenty-four hours and were therefore identified as being at ACDC only one day.</p> <p>Per interviews with ACDC staff to include intake and booking, ACDC staff are notified prior to the arrival of a youthful offender by law enforcement officers. The entry area is cleared of all adult offenders prior to the youthful offender's entry. Staff maintain direct observation of the youthful offenders upon entry throughout the search, booking procedures, medical, and mental health and daily assignment at ACDC.</p> <p>Youthful offenders are housed in a separate pod away from all other detainees to include adults. The designated housing pod does not allow sight and/or sound between the youthful offenders and adult detainees. Youthful offenders and adult detainees do not share dayrooms, visitation, meals, recreation, showers, common areas, telephone usage, and/or sleeping quarters together. Each housing unit has a designated recreation yard accessible from within their housing unit. Interaction between the adults and youthful offenders is not accessible at any time.</p> <p>Interviews were conducted with line staff and supervisors who work with the youthful offenders (17 years old). Per interviews with the ACDC PREA Coordinator, line staff and supervisory staff, educational programs are not offered at ACDC. Available programs are limited to recreation that includes a secured outside recreation area. Per the review of arrival and departure date of the youthful offenders, 99.8% departed the ACDC on the date of their arrival as they may only be identified to have committed minor misdemeanor charges and are eligible for release on self-bond and/or their release to parents.</p> <p>There were zero youthful offenders housed at ACDC during the on-site visit for interview and/or observation.</p> <p>Based on the review of ACDC policy #200-36, interviews with line staff and limited program staff, review of youthful offenders' arrival and departure date, observation of available housing units (unoccupied), ACDC does meet all provisions of the standard.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Per-Audit Questionnaire (PAQ) 2. ACDC #400-13-01, Responding to Detainee & Staff Sexual Misconduct: Prevention Planning 3. ACDC #400-13.06P, Lesbian, Gay, Bisexual, Transgender, and Intersex (LGBTI) Persons in Custodial Settings 4. Observation during site visit 5. Interviews: <ol style="list-style-type: none"> a. Random Staff b. Random Detainees c. ACDC PREA Coordinator d. Risk Screening Staff e. Housing Unit Officers f. Intake and Booking Staff <p>115.15 (a) In accordance with ACDC #400-13.01, Strip searches and visual searches of the anal or genital opening done by male staff to female, inmates or by female staff to male inmates (i.e., cross-gender) are not allowed, except in exigent circumstances or when done by medical practitioners. Per interviews with the PREA Coordinator, visual searches are not conducted by staff assigned to the City of Atlanta Department of Corrections. Staff are only authorized and assigned to conduct pat-down searches. The female staff perform pat searches of female detainees and male detainees. Male staff conduct searches of male detainees only. Pat-down searches of detainees identified as transgender and /or intersex are completed by the gender of staff requested. The escorting law enforcement is responsible for ensuring the control of the detainees' items and/or contraband prior to arrival at the facility. Strip searches and visual searches are not conducted by staff at the ACDC. This was confirmed through observation during the site visit and interviews with staff and the detainee population.</p> <p>115.15(b) (c) Pursuant to ACDC #400-13.01, Strip searches and visual searches of the anal or genital opening done by male staff to female, inmates or by female staff to male inmates (i.e., cross-gender) are not allowed, except in exigent circumstances or when done by medical practitioners. The following activities will be documented: a) Cross-gender strip searches; b) Cross-gender visual body cavity searches; c) Cross-gender pat-down searches for females. Per observation of the arrival of detainees by local law enforcement officers, the intake process to include search procedures, and interviews with staff and the randomly selected 16 detainees for interview, ACDC staff does not conduct visual searches of the detainee population. ACDC staff only conducts pat-down searches of the detainees and searches of personal property only. Female staff are authorized to conduct both male and female pat-searches while male staff are only authorized to conduct searches on male detainees. Staff interviews also confirmed detainees identified as transgender and/or intersex would be offered to opportunity to select the gender of staff to conduct the pat-down search. Per the PAQ and interviews with the PREA Coordinator, and ACDC PREA Compliance Manager, there were zero cross-gender strip searches, cross-gender visual body cavity searches and or cross-gender pat-down searches where male staff conduct searches of female detainees. Per interviews with five female detainees, all reported their pat-down searches at ACDC were conducted by female staff only.</p> <p>115.15 (d) 400-13-01, and ACDC 400-13.06P, Detainees/Inmates will be able to shower, perform bodily functions and change clothing without nonmedical staff of the opposite sex seeing breasts, buttocks, or genitals except in unusual circumstances or if it occurs unintentionally. All inmates shall be given the opportunity shower in a separate shower stall from other inmates. Transgender and intersex inmates will be given the opportunity to shower separately from other inmate while other inmates will be placed in their cell. Interviews conducted with both random and specialized staff indicated the housing unit officer has been assigned to make the announcement of opposite gender staff entering the housing units. Announcements by housing officers must be made when an individual is entering a housing for inmates of the opposite sex. Observations during the two-day site visit confirmed the assigned housing unit officer was responsible and ensured the announcement of opposite gender staff entering the housing units was announced. Interviews with staff also acknowledged detainees identified as transgender and/or intersex are authorized to shower at a separate time from other detainees who are secured in their assigned cells. The auditor observed all showers throughout the facility are in individual shower stalls</p>

with ¾ shower doors that allow privacy during showering but not interfere with maintaining security precautions. Interviews with the 16 random selected detainees confirmed they are able to shower, change clothes, and perform bodily functions without staff of the opposite gender viewing. There were zero detainees housed at ACDC during the two-day site visit identified as transgender and/or intersex to complete an interview.

115.15 (e) Pursuant to ACDC #400-13.01, The department shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or necessary, by learning the information as part of a broader medical examination conducted in private by a medical practitioner. NOTE: Medical staff shall not conduct any searches. ACDC does not conduct any visual searches of detainees. However, staff confirmed their awareness that searches of transgender and/or intersex detainees for the sole purpose of determining their genital status is prohibited. The auditor observed the intake and booking process of newly arriving detainees during the two-day site visit. During the risk screening detainees were asked to identify their genital status to include whether they are transgender and intersex. Per an interview with staff conducting the risk screening, he has not encountered any circumstances in which detainees have refused to acknowledge their genital status during risk screening.

115.15 (f) The Search Training Lesson Plan states, staff will receive training on how to conduct professional and respectful cross-gender pat-down searches and searches for transgender and intersex inmates in the least intrusive way possible. Transgender or intersex inmates cannot be searched or physically examined to determine genital status. The PREA training lesson plan includes conducting searches of transgender and intersex detainees. Sessions included in the training include: i) No search or physical exam may be conducted when the only purpose is to determine the inmate's genital status. ii) the agency will follow the recommendations made by the National Center for Transgender Equality (NCTE) and permit transgender and intersex detainees to make a choice at admission as to whether they will be searched by male or female officer. All searches must be conducted in the least intrusive manner possible, and staff must be trained on how to be professional and respectful in conducting searches of transgender and intersex detainees. Male staff are prohibited from conducting pat-down searches of female inmates, absent exigent circumstances. Exigent circumstances are defined as any set of temporary circumstances that require immediate action in order to combat a threat to the security or institutional order of the facility. Per the PAQ and interviews with staff, there were zero cross-gender pat-down and/or cross-gender visual searches of the detainees at ACDC during the 12-month review period. Although all staff are required to complete the search training within the PREA training, only sworn correctional staff are authorized to conduct pat searches of the detainees. Civilians are not authorized to conduct searches of the detainee. A copy of the Search Training Lesson Plan and confirmation of completed training was provided for review.

Based on the review of ACDC policies, review of the search training lesson plan, confirmation of search training with the PREA lesson plan, observation of searches conducted by staff, interviews with staff and detainees, it is determined ACDC does meet all provisions of the standard.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC 400-13-01, Responding to Detainee & Staff Sexual Misconduct: Prevention Planning 3. iSpeak ATL Language link <p>Interviews:</p> <ol style="list-style-type: none"> a. Chief of Corrections b. ACDC PREA Coordinator c. Bi-lingual staff who provide translation services d. Random staff e. Intake, Booking, Medical and Mental Health Staff <p>115.16 (a) In accordance with ACDC 400-13-01, Supervisors shall ensure appropriate steps to ensure detainees/inmates with disabilities (i.e., deaf or hard of hearing , those who are blind or have low vision , or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the prevention, detection and response to sexual abuse and sexual harassment, such steps shall include (when necessary to ensure effective communication with detainees/inmates who are deaf or hard of hearing) providing access to interpreters who can interpret effectively, accurately, and impartially.</p> <p>115.16 (b) The City of Atlanta Department of Corrections uses the toll-free Language Line to provide telephonic interpretation services for inmates who have limited English proficiency. When, available, staff that are proficient in Spanish are utilized to provide interpretation for Spanish-speaking inmates. The ACDC uses the toll-free Language Line to provide telephonic interpretation services for inmates who have limited English proficiency. An interview was conducted with a staff member identified as bi-lingual and available to provide translations in the Spanish language for the detainee population as needed. He confirmed his commitment to the facility in providing translation services in the Spanish speaking detainees. He stated he provides assistance during the intake and booking while explaining PREA and the meaning of it, the facility' zero tolerance for sexual abuse and sexual harassment and their right to be free from it. He also assists medical staff and classification staff during the risk screening and re-assessments. Per the ACDC PREA Coordinator and ACDC Business Manager, there is no formal contract. However, the City of Atlanta utilizes the iSpeak ATL Language link (there is a cost associated with the services). The link is https://www.welcomingatlanta.com/ispeakatl/. Prior to the removal of ICE immigrants, the Inmate Services Unit had a free language line that was provided by ICE. Per an interview with the Chief of Corrections, translation services are available through the partner agency Atlanta Police Department, and the Fulton County Jail as needed.</p> <p>The City of Atlanta Department of Corrections Inmate /Detainee Handbook is available in both English and Spanish in addition to the Inmate Orientation Script. PREA posters are posted throughout the facility to include in booking and admission, housing units, medical, mental health and program areas in both the English and Spanish languages.</p> <p>115.16 (c) Detainees/inmates will not be used as interpreters, readers or other types of assistants except in limited circumstances where extended delay in obtaining an effective interpreter could compromise the detainee/inmate's safety. Per the PAQ and interview with the PREA Coordinator, there were 0 instances where a detainee provided translation services for another detainee. Interviews with staff confirmed they would not use another detainee to provide translation services for a detainee who is attempting to report a PREA allegation. All were aware of available staff who can translation in the Spanish language was aware of the available iSpeak Language line for assistance in communicating with detainees identified with disabilities. Each stated they would contact their supervisor for assistance when addressing such instances.</p> <p>The ACDC reported there were zero detainees at the facility identified as Limited English Proficient during the review period. Therefore, zero detainees with disabilities and or identified as Limited English Proficient were housed at the facility during the site visit to interview. This information is tracked by the ACDC Professional Standard Captain/ ACDC PREA Compliance Manager.</p> <p>The facility's count on the first day upon arrival of the site visit was 59. At the end of the first day site visit the count was 41. Pre interviews with the ACDC PREA, and ACDC PREA Compliance Manager and observation during the on-site visit, there were zero detainees identified at the facility with disabilities and or Limited English Proficient. However, the facility does track</p>

the arrival of detainees who are identified with disabilities and who are Limited English Proficient. ACDC reported there were 120 detainees at the facility during the 12-month review period of April 1, 2021, through March 31, 2022. Of these 120-detainees, 8 were identified as completely blind, blind in one eye, legally blind and/or low vision. Six were identified hard of hearing with one identified as deaf. The remaining 106 detainees were identified to have physical disabilities only. There were zero detainees housed at ACDC identified with disabilities to include Limited English Proficient during the site visit to conduct interviews. This information is tracked and monitored by the ACDC Professional Standard Captain/ ACDC PREA Compliance Manager.

Interviews with the intake, medical and booking staff, in addition to the randomly selected 17 detainees confirmed the PREA video is continuously played in the intake and booking area and is visually available to all detainees while being advised by staff to observe it. Staff and detainees confirmed that staff verbally explains PREA and how to report to each detainee upon arrival. Staff acknowledged the one deaf detainee previously admitted to the facility was able to read the PREA educational material given to him.

Based on the review of ACDC policy, interviews with staff to include staff who provide translation service, and staff who conduct the intake and booking, and review of the iSpeak ATL language access website, it is determined that ACDC does meet all standard provisions.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 812 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 329 1190 757" style="list-style-type: none"> 1.City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13-01, Responding to Detainee & Staff Sexual Misconduct: Prevention Planning 3.ACDC #700-47 Administration & Management (Employee Hiring Decision Rules) 4. Pre-Investigative Interview Questionnaire 5. Pre-Promotional Interview Questionnaire 6. Background Checks for New Hires, Annual Background Checks, and Staff Promotions 7. Interview: <ol data-bbox="240 730 592 757" style="list-style-type: none"> a. Career Development Supervisor <p data-bbox="240 788 1485 981">115.17 (a) (b) Pursuant to ACDC 700-47, and ACDC 400-13.01, the City of Atlanta Department of Corrections will not hire or promote anyone who may have contact with inmates if they: a) Have engaged in sexual abuse in an institutional setting (e.g., jail, lockup, community confinement facility, juvenile facility, or a facility for people who are mental ill, disabled, chronically ill. b) Have been convicted of engaging d or attempting to engage in (or have been civilly or administratively adjudicated to have engaged in) in sexual activity in the community by use of force, the threat to force or coercion, or if the victim did not consent or was not able to consent or refuse. Phase 2 of the hiring procedures requires the completion of a background investigation.</p> <p data-bbox="240 1012 1477 1070">In applications, interviews, or self-evaluations for promotion or job reviews, the City of Atlanta Department of Corrections will ask directly about previous sexual misconduct.</p> <p data-bbox="240 1102 1469 1263">An interview was conducted with the Career Development Supervisor whose department is responsible for conducting all staff background checks. She indicated ACDC does consider prior incidents of sexual abuse and sexual harassment when determining to hire and/or promote anyone who may have contact with the detainee population. All applicants and staff seeking promotions, are required to respond to the questionnaire acknowledging whether or not they have prior incidents of sexual abuse and/or sexual harassment and if so, they would not be considered for employment.</p> <p data-bbox="240 1294 1477 1787">Per the interview and the review of a roster identifying staff new hires and staff selected for promotion during the review period identified 24 new hires and 9 staff selected for promotion. The auditor selected 8 new hires that included 1 contractor and all 9 staff selected for promotion for the review of background checks and acknowledgement of the identified questions related to a history of prior sexual abuse and sexual harassment. The review of both the Pre-Investigative Interview Questionnaire and Pre-Promotional Interview Questionnaire states the City of Atlanta Department of Corrections shall not hire or promote anyone who may have contact with detainees, and shall not enlist the services of any contractor (contracted employee) who may have contact with detainees, who – has engaged or been convicted in sexual abuse/sexual harassment in a s prison, jail, lockup, community confinement facility, juvenile facility, or tother institution. Applicants for both new hire and promotions are asked the following questions 1) Have you previously worked in a prison, jail, lockup, community confinement or juvenile facility? 2) Have you ever engaged in sexual abuse in a prison, jail, lockup, community confinement or juvenile facility, other institution? 3) Have you been convicted engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? 4) Have you been civilly or administratively adjudicated in the activity described in question #3? 5) Have you had any substantiated cases of staff on inmate sexual harassment? All applicants and staff selected for promotion Applicants are required to respond yes or no to each question and identify the location of applicable responses.</p> <p data-bbox="240 1818 1458 1980">115.17 (c) (d) (e) In accordance with ACDC 700-47, and ACDC 400-13.01, Prior to hiring new employees and contractor employees, the City of Atlanta Department of Corrections will check criminal background records and contact former institutional employers to inquiry about substantiated allegations of sexual abuse and resignation during a pending investigation into an allegation of sexual abuse. Phase 2 of the hiring procedures requires the completion of a background investigation.</p> <p data-bbox="240 2011 1477 2136">An interview was conducted with the Career Development Supervisor whose department is responsible for conducting all staff background checks. She stated background checks are conducted on all applicants prior to the selection for hire. The background investigation is conducted to ensure applicants have not omitted information that would make them ineligible for employment. Background checks are conducted on both sworn and civilian employees to include contractors. Interviews and</p>

the review of a roster identifying staff new hires and staff selected for promotion during the review period identified 24 new hires and 9 staff selected for promotion. The auditor selected 8 new hires that included 1 contractor and all 9 staff selected for promotion for the review of background checks and acknowledgement of the identified questions related to a history of prior sexual abuse and sexual harassment.

A Georgia Crime Information Center (GCIC) certified employee designated by the Chief will conduct annual criminal history and DMV inquiries for all City of Atlanta Department of Corrections employees and annual criminal history for contracted employees. All employees are responsible for authorizing the release of their criminal and DMV history by means of a signed agreement that gives the authorized agent of the Department permission to access the GCIC for criminal history report and DDS for a driver's history report annually. It is the responsibility of the Office of Professional Accountability (OPA) to investigate of any allegation of an employee arrest.

In accordance with Employee Arrest Procedures: When an employee (sworn or civilian) of the Department of Corrections has been arrested or involved in any criminal violation he/she will report the incident to the Chief and Office of Professional Accountability (OPA) as soon as possible, but at least within 48 hours of the incident. If the employee provides the notification through a third party, he/she has the responsibility to follow-up to ensure the notification was provided within 48 hours. Within the same 48 hours, the sworn employee will also personally notify the Georgia Peace Officer Standards and Training Council within 72 hours.

Per an interview with the Career Development Supervisor, ACDC is linked directly into the Georgia Bureau of Investigations (GCIC). The GCIC 's data base allows her department to run criminal history of all applicants and annually on current staff. The background checks are completed every 12 months such as employees' annual background checks were run in January 2021 and again in January 2022. All staff annual background checks are completed within the month. The auditor randomly selected six staff for confirmation of annual background checks with no discrepancies noted.

115.17 (f) Any incident of sexual harassment will be taken into an account when hiring or promoting employees or contracting employees.

Per an interview with the Career Development Supervisor, the application process for both new hires and staff seeking promotions are required to respond to the questionnaire included in the packet in order to be considered for hire and/or promotion consideration.

A review of the Pre-Promotional Interview Questionnaire states the City of Atlanta Department of Corrections shall not hire or promote anyone who may have contact with detainees and shall not enlist the services of any contractor (contracted employee) who may have contact with detainees, who – has engaged or been convicted in sexual abuse/sexual harassment in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. Applicants for both new hire and promotions asked the following questions 1) Have you previously worked in a prison, jail, lockup, community confinement or juvenile facility? 2) Have you ever engaged in sexual abuse in a prison, jail, lockup, community confinement or juvenile facility, other institution? 3) Have you been convicted engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? 4) Have you been civilly or administratively adjudicated in the activity described in question #3? 5) Have you had any substantiated cases of staff on inmate sexual harassment? Applicants are required to respond yes or no to each question and identify the location of applicable responses.

In accordance with Employee Arrest Procedures: When an employee (sworn or civilian) of the Department of Corrections has been arrested or involved in any criminal violation he/she will report the incident to the Chief and Office of Professional Accountability (OPA) as soon as possible, but at least within 48 hours of the incident. If the employee provides the notification through a third party, he/she has the responsibility to follow-up to ensure the notification was provided within 48 hours. Within the same 48 hours, the sworn employee will also personally notify the Georgia Peace Officer Standards and Training Council within 72 hours.

115.17 (g) Pursuant to ACDC # 400-13.01, Personnel who omit facts or give false information will be subject to termination. Employees have an ongoing obligation to disclose any such sexual misconduct. Department of Corrections will ask directly about previous sexual misconduct. Both the Pre-Investigative Interview Questionnaire and Pre-Promotional Interview Questionnaire states the City of Atlanta Department of Corrections has a statement: "I understand that I must answer these honestly. The subject matter will be included in my background investigation. Misrepresentation, deliberate omission, or falsification found on any of the questions will automatically disqualify me from further consideration."

In accordance with ACDC #700-47, Misrepresentation, deliberate omission or falsification of documentation of any misconduct will automatically disqualify new employees and contracted employees from being hired. Current employees will face grounds for termination. Per an interview with the Career Development Supervisor, an applicants' and/or current employee's omission of requested information and/or identified as false information would be grounds for immediate termination.

115.17 (h) In accordance with Atlanta City Detention Center Employee Annual Criminal History and Motor Vehicle Inquiries

700-24 Prior to hiring new employees and contracted employees, the City of Atlanta Department of Corrections will check criminal background records and contact former institutional employers to inquiry about substantiated allegations of sexual abuse and resignations during a pending investigation into an allegation of sexual abuse.

Per an interview with the Career Development Supervisor, ACDC will release information on substantiated of sexual abuse and/or sexual harassment involving a former employee upon receiving a request form an institutional employer for whom such employee has applied. She continued in stating; however, the requesting agency will be required to forward a signed waiver completed by the former employee giving authorization to release the information. The OPA would be involved in the review of previous reported allegations and providing the response.

Based on the review of ACDC policies, review of the completed Pre-Investigative Interview Questionnaire and Pre-Promotional Interview Questionnaire for new applicants and staff selected for promotions, completed background checks for ACDC new hires, a contractor, staff selected for promotions and annual background checks, it is determined that ACDC meets all provisions of the standard.

115.18	<p>Upgrades to facilities and technologies</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed (Pre-audit Questionnaire (PAQ)) 2. ACDC #400-13-01, Responding to Detainee & Staff Sexual Misconduct: Prevention Planning 3. Interviews: <ol style="list-style-type: none"> a. ACDC Chief of Corrections b. ACDC PREA Coordinator c. Agency Head <p>115.18 (a) (b) In accordance with #400-13-01, The agency in collaboration with the PREA Coordinator will consider when designing o acquiring any substantial expansion or modification of the existing facility (including updating video monitoring, electronic surveillance system or other monitoring technology, the effect of the existing facility, acquisition or expansion) shall consider how such technology or upgrades may enhance or modify the department's ability to protect detainees/inmates form sexual abuse. The agency will provide information on substantiated allegations of sexual abuse or sexual harassment to possible future institutional employers. Per interviews with the PREA Coordinator, Chief of Corrections, and Agency Head, there has not been any expansion or modification of the existing facility to include video monitoring since the last PREA audit in 2018. However, any modifications to the existing facility would be made in continued compliance with the American Correctional Association and within the PREA standards and based on the facility's obligation to provide a safe environment for the detainees and staff from sexual abuse.</p> <p>The Chief of Corrections and Agency Head confirmed the facility did receive funding for video upgraded that only allowed the replacement of faulty cameras. The facility has a total of 230 cameras that assist in providing a safe environment for both staff and the inmate population from sexual abuse. Cameras are also installed in areas where staff and the detainee population have one on one interaction and areas previously identified as blind spots to assist in the prevention of sexual abuse allegations Any increase in electronic surveillance would be based on increasing a safer environment from sexual abuse involving detainee on detainee and staff on detainee.</p> <p>Based on the interviews with the ACDC PREA Coordinator, ACDC Chief of Corrections, Agency Head, review of ACDC policy #400-13.01, and observation during the site visit, ACDC does meet all provisions of the standard.</p>
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13-02, Responding to Detainee & Staff Sexual Misconduct: Responding to Inmate Sexual Assault 3. MOU Between ACDC and Grady Rape Crisis Center 4. ACDC 400-13.05, Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations 5. Interviews: <ol style="list-style-type: none"> a. Crisis Center Project Coordinator b. Crisis Center Director c. ACDC PREA Coordinator d. Grady Hospital Charge Nurse e. ACDC PREA Compliance Manager f. ACDC Facility Victim Advocate <p>115.21 (a) (b) (c) (d) (e) (f) (g) (h) In accordance with the ACDC #400-13.05, In accordance with ACDC #400-13.05, The Facility /Housing Commander and/or Office of Professional Accountability (OPA) is responsible for ensuring a thorough and objective investigation of the incident is completed. The Watch Commanders or designee are responsible for ensuring a thorough and investigation of the PREA incidents, occurring within the facility is forwarded to the OPA for investigation. The Watch Commanders or designee shall ensure the incident reports are detailed, completed, reviewed and submitted prior to the end of the tour of duty following any PREA incident and email a brief statement of the incident to the SART Team members and Accreditation Manager. A full report will be forward to the Facility Commander and Accreditation Manager.</p> <p>Watch Commanders or designees are required to consult with the OPA prior to notifying the Atlanta Police Department (APD) Special Crime Victims Unit of any allegations of sexual abuse that appear to be criminal in nature. The investigations of detainee/inmate sexual abuse and sexual harassment are required to be conducted by the OPA, promptly, thoroughly, and objectively, including those reported by third-party and anonymously.</p> <p>Interviews conducted with 18 random staff confirmed their understanding of the ACDC protocol for obtaining usable physical evidence if a detainee reported an allegation of sexual abuse. All staff identified the first responder duties and preserving aal obtainable physical evidence and contacting their next in command security supervisor who will take charge of incident.</p> <p>A review of the one reported sexual harassment allegation during the review period and no reported allegations of sexual abuse that included sexual penetration in over 10 years per the OPA Investigator. However, the protocol based on the most recent edition of the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examination, Adult/Adolescent.</p> <p>Per interviews with the ACDC PREA Coordinator/Director of Nurses, Medical Doctor, Mental Health Administrator, Grady Rape Crisis Center (RCC) Project Coordinator, and the Director of the Grady Rape Crisis Center sexual assault forensic examination will be conducted at the Grady Memorial Hospital. The Grady Rape Crisis Center is located within the Grady Memorial Hospital. SANE are on call and upon being advised of sexual assault victim, they report to the Center normally between 30 - 45 minutes of being notified. These services are free to the victim and the ACDC facility. ACDC staff and the Grady Rape Crisis Center confirmed there were no detainees who reported sexual assault in recent years.</p> <p>In accordance with ACDC #400-13.02, Victims should be encouraged, but not forced to consent to a sexual abuse examination but may refuse. Sexual abuse examination will be conducted at Grady Hospital. Victims will have access to free forensic medical examination and the department will make attempts to ensure the examination are conducted by a Sexual Assault Nurse Examiner (SANE).</p> <p>A Memorandum of Understanding (MOU) was established on April 15, 2015, between ACDC and the Grady Rape Crisis Center. The attending Director of Grandy Rape Crisis Services signed the existing MOU on June 1, 2022, acknowledging the MOU continues to be effective. The MOU identifies the RCC will provide support and advocacy to inmates for a sexual abuse</p>

incident occurring at ACDC. Upon request from victims, provide a victim advocate at accompany and support the victim through the forensic medical examination process and investigatory interviews and will provide emotional support, crisis intervention, information, and referrals. There were no detainees/inmates who reported allegations of sexual abuse that involved sexual penetration occurring at ACDC in over 10 years per the OPA Investigator. Per the Grady Rape Crisis Center Director, services will be available to the victim while at the hospital and resources will be provided to the detainee for continued services to include upon release from ACDC. The MOU identifies the services for detainees within the facility will be provided by mental health staff at the facility.

Interviews were conducted with both the Grady Rape Crisis Center Project Coordinator and the Grady Rape Crisis Center Director. Both acknowledged a Memorandum of Understanding (MOU) with the ACDC. Per the Director, when a detainee reported to the hospital, the detainee will be transported to room #4 where forensic examinations are completed by a SANE. Prior to the examination, contact will be initiated for the arrival of a victim advocate. The forensic examination will begin after the arrival of the victim advocate. This procedure prevents the victim from additional traumatization in having to repeat the happening of the occurrences more than once. However, the victim has the option of a victim advocate present or not. She continued in saying she is unaware of any detainees reporting from ACDC for SANE examinations, and/or having any communication with detainees from ACDC. If a detainee elects to communication with the Crisis Center, they have the right to remain anonymous when reporting sexual abuse, and the incident can only be reported upon receiving authorization from the victim. However, the victim would be encouraged to report the sexual assault to the local police department.

Per the Grady Rape Crisis Center Director, and Project Coordinator, a victim is always available to provide services to victims of sexual abuse. However, per the ACDC PREA Coordinator and confirmed by the ACDC Behavioral Health Administrator she is also available to serve as a qualified victim advocate via her Professional Licensing in Professional Counseling, and Social Worker received issued through the Georgia Security of State Board. She stated although she is required to serve as such, services as a victim advocate have not been needed for reported allegations of sexual abuse at ACDC. She added, she is available to assist a victim housed at the facility through investigatory interviews and provide emotional support, crisis intervention, and information and referrals upon release from ACDC.

ACDC is responsible for conducting administrative sexual abuse investigations. The Atlanta Police Department Special Crime Victims Unit is responsible for conducting all criminal investigations. A letter addressed from the City of Atlanta Police Department (APD) Chief of Police to the ACDC. The letter confirmed in accordance with the ACDC policy, allegation sexual abuse occurring within the ACDC that appear to be criminal in nature will be referred to the APD Special Victim 's Unit for criminal investigation.

There were zero reported allegations of sexual abuse reported that alleged sexual penetration and no forensic medical examination conducted. There were no detainees housed at ACDC who reported allegations of sexual abuse during the site visit to complete interviews.

Based on the review of the established MOU with the Grady Rape Crisis Center, and ACDC, letter from the Atlanta Police Department to conduct ACDC sexual abuse allegations that appear to be criminal, interviews with the Grady Rape Crisis Center Director, and Project Coordinator, ACDC PREA Coordinator, random staff ACDC qualified staff who serves as a facility victim advocate, ACDC meets all provisions of the standard.

115.21 (a) (b) (c) (d) (e) (f) (g) (h) In accordance with the ACDC #400-13.05, The Facility /Housing Commander and/or Office of Professional Accountability (OPA) is responsible for ensuring a thorough and objective investigation of the incident is completed. The Watch Commanders or designee are responsible for ensuring a thorough and investigation of the PREA incidents, occurring within the facility is forwarded to the OPA for investigation. The Watch Commanders or designee shall ensure the incident reports are detailed, completed, reviewed and submitted prior to the end of the tour of duty following any PREA incident and email a brief statement of the incident to the SART Team members and Accreditation Manager. A full report will be forward to the Facility Com 115.21 (a) (b) (c) (d) (e) (f) (g) (h) In accordance with the ACDC #400-13.05, The Facility /Housing Commander and/or Office of Professional Accountability (OPA) is responsible for ensuring a thorough and objective investigation of the incident is completed. The Watch Commanders or designee are responsible for ensuring a thorough and investigation of the PREA incidents, occurring within the facility is forwarded to the OPA for investigation. The Watch Commanders or designee shall ensure the incident reports are detailed, completed, reviewed and submitted prior to the end of the tour of duty following any PREA incident and email a brief statement of the incident to the SART Team members and Accreditation Manager. A full report will be forward to the Facility Commander and Accreditation Manager.

Watch Commanders or designees are required to consult with the OPA prior to notifying the Atlanta Police Department (APD) Special Crime Victims Unit of any allegations of sexual abuse that appear to be criminal in nature. The investigations of detainee/inmate sexual abuse and sexual harassment are required to be conducted by the OPA, promptly, thoroughly, and objectively, including those reported by third-party and anonymously.

Interviews conducted with 18 random staff confirmed their understanding of the ACDC protocol for obtaining usable physical evidence if a detainee reported an allegation of sexual abuse. All staff identified the first responder duties that include preserving all obtainable physical evidence and contacted their next in command security supervisor who will take charge of

the incident.

There was one reported sexual harassment allegation during the review period and zero reported allegations of sexual abuse that included sexual penetration in over 10 years per the OPA Investigator. However, the protocol based on the most recent edition of the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examination, Adult/Adolescent.

Per interviews with the ACDC PREA Coordinator/Director of Nurses, Medical Doctor, Mental Health Administrator, Grady Rape Crisis Center (RCC) Project Coordinator, Grady Memorial Hospital Charge Nurse, and the Director of the Grady Rape Crisis Center sexual assault forensic examination will be conducted at the Grady Memorial Hospital. The Grady Rape Crisis Center is located within the Grady Memorial Hospital. SANE are on call and upon being advised of sexual assault victim, they report to the hospital normally between 30 - 45 minutes of being notified. These services are free to the victim and the ACDC facility. ACDC staff and the Grady Rape Crisis Center confirmed there were no detainees who reported sexual assault in recent years from ACDC.

In accordance with ACDC #400-13.02, Victims should be encouraged, but not forced to consent to a sexual abuse examination but may refuse. Sexual abuse examination will be conducted at Grady Hospital. Victims will have access to free forensic medical examination and the department will make attempts to ensure the examination are conducted by a Sexual Assault Nurse Examiner (SANE).

A Memorandum of Understanding (MOU) was established on April 15, 2015, between ACDC and the Grady Rape Crisis Center. The attending Director of Grady Rape Crisis Services signed the existing MOU on June 1, 2022, acknowledging the MOU continues to be effective. The MOU identifies the RCC will provide support and advocacy to inmates for a sexual abuse incident occurring at ACDC. Upon request from victims, provide a victim advocate to accompany and support the victim through the forensic medical examination process and investigatory interviews and will provide emotional support, crisis intervention, information, and referrals. There were no detainees/inmates who reported allegations of sexual abuse that involved sexual penetration occurring at ACDC in over 10 years per the OPA Investigator. Per the Grady Rape Crisis Center Director, services will be available to the victim while at the hospital and resources will be provided to the detainee for continued services to include upon release from ACDC. The MOU identifies the services for detainees within the facility will be provided by mental health staff at the facility.

Interviews were conducted with both the Grady Rape Crisis Center Project Coordinator and the Grady Rape Crisis Center Director. Both acknowledged a Memorandum of Understanding (MOU) with the ACDC. Per the Director, when a detainee reports to the hospital, the detainee will be transported to room #4 where forensic examinations are completed by a SANE. Prior to the examination, contact will be initiated for the arrival of a victim advocate. The forensic examination will begin after the arrival of the victim advocate. This procedure prevents the victim from additional traumatization in having to repeat the occurrences more than once. However, the victim has the option of a victim advocate present or not. She continued in saying she is unaware of any detainees reporting from ACDC for SANE examinations, and/or having any communication with detainees from ACDC. If a detainee elects to communication with the Crisis Center, they have the right to remain anonymous when reporting sexual abuse, and the incident can only be reported upon receiving authorization from the victim. However, the victim would be encouraged to report the sexual assault to the local police department.

Per the Grady Rape Crisis Center Director, and Project Coordinator, a victim advocate is always available to provide services to victims of sexual abuse. However, per the ACDC PREA Coordinator and confirmed by the ACDC Behavioral Health Administrator she is also available to serve as a qualified victim advocate via her Professional Licensing in Professional Counseling, and Social Worker issued through the Georgia Secretary of State Board. She stated although she is required to serve as such, services as a victim advocate have not been needed for reported allegations of sexual abuse at ACDC. She added, she is available to assist victims of sexual abuse housed at the facility through investigatory interviews, provide emotional support, crisis intervention, and information and referrals upon release from ACDC.

ACDC is responsible for conducting administrative sexual abuse investigations. The Atlanta Police Department Special Crime Victims Unit is responsible for conducting all criminal investigations. A letter addressed from the City of Atlanta Police Department (APD) Chief of Police to the ACDC. The letter confirmed in accordance with the ACDC policy, allegations sexual abuse occurring within the ACDC that appear to be criminal in nature will be referred to the APD Special Victim 's Unit for criminal investigation.

There were zero reported allegations of sexual abuse reported that alleged sexual penetration and no forensic medical examinations required and /or conducted. There were no detainees housed at ACDC who reported allegations of sexual abuse during the site visit to complete interviews.

Based on the review of the established MOU with the Grady Rape Crisis Center, and ACDC, letter from the Atlanta Police Department to conduct ACDC sexual abuse allegations that appear to be criminal, interviews with the Grady Rape Crisis Center Director, and Project Coordinator, ACDC PREA Coordinator, random staff ACDC qualified staff who serves as a facility victim advocate, ACDC meets all provisions of the standard.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

1. Evidence Reviewed (documents, interviews, site review):
 2. ACDC Completed Pre-Audit Questionnaire (PAQ)
 3. ACDC #400-13.05, Responding to Detainee & Staff Sexual Misconduct: Reporting and Investigations
 4. ACDC website <https://www.atlantaga.gov/government/departments/corrections>,
 5. Atlanta Police Department website <https://www.atlantapd.org/about-apd/criminal-investigations-divisionp>>
 6. PREA Investigative Casefile
4. Interviews:
- a. Office of Professional Authority (OPA) Investigator
 - b. Head of Agency

115.22 (a) (b) (c) (d) (e) In accordance with ACDC #400-13.05, The Facility /Housing Commander and/or Office of Professional Accountability (OPA) is responsible for ensuring a thorough and objective investigation of the incident is completed. The Watch Commanders or designee are responsible for ensuring a thorough and investigation of the PREA incidents, occurring within the facility is forwarded to the OPA for investigation. The Watch Commanders or designee shall ensure the incident reports are detailed, completed, reviewed and submitted prior to the end of the tour of duty following any PREA incident and email a brief statement of the incident to the SART Team members and Accreditation Manager. A full report will be forward to the Facility Commander and Accreditation Manager.

Watch Commanders or designees are required to consult with the OPA prior to notifying the Atlanta Police Department (APD) Special Crime Victims Unit of any allegations of sexual abuse that appear to be criminal in nature. The investigations of detainee/inmate sexual abuse and sexual harassment are required to be conducted by the OPA, promptly, thoroughly, and objectively, including those reported by third-party and anonymously.

Per the PAQ and interviews with the OPA Investigator, ACDC PREA Coordinator and ACDC PREA Compliance Manager, there was one reported PREA allegation during the 12-month review period. The allegation was reported as staff on detainee sexual harassment. The administrative investigation was completed by the ACDC OPA Investigator. The allegation did not include possible criminal actions that require a referral to the Atlanta Police Department.

Per an interview with the agency head, he confirmed upon notification of alleged sexual harassment and/or sexual abuse, the allegation would be reported to the OPA for investigation. When actions described could possibly include criminal charges, the allegations would be immediately referred to the Atlanta Police Department Special Victims Crime Unit for completion of a criminal investigation. The ACDC OPA Investigator will continue with an administrative investigation to identify policy and/or procedure violations. A thorough investigation would be completed that includes the collection and review of all available evidence, the review of available video, interviews with all involved, witnesses, a review of both criminal history and/or previous allegations reported, previous write-ups, the completion of a forensic examination if applicable, a timeline detailing all evidence reviewed and interviews conducted, medical and mental health services provided to both, to include after-care to the victim, counseling and support services offered and accepted, and a detailed summary of the investigative findings while ensuring all investigative steps were completed throughout.

An interview conducted with the OPA Investigator who conducts administrative investigations only, confirmed the OPA Investigators conduct administrative investigation on all reported sexual harassment and sexual abuse allegations.

Allegations that include possible criminal charges are referred to the Atlanta Police Department Special Crime Victims Unit for the completion of the investigation. She added since the initiation of the Atlanta City Ordinance that allows the arresting detainees of minor misdemeanor charges to be released with a no case bond (self-bond), removal of ICE detainees and federal inmates in 2018, the facility detainee count has remained low with an average daily count of 46. She added the most recent allegation of sexual abuse in previous years was determined as unfounded. She concluded in stating during her 10-year tenure as an OPA Investigator at the facility, there has not been an allegation of sexual abuse that involved penetration.

A review of the ACDC's website <https://www.atlantaga.gov/government/departments/corrections>, confirmed ACDC informs the public of agency's commitment to conduct investigation of sexual abuse and sexual harassment. A review of the Atlanta Police Department website was also confirmed the agency as a division designated to conduct criminal investigations at <https://www.atlantapd.org/about-apd/criminal-investigations-divisionp>>

Based on the review of ACDC policies, interviews with staff, review of the investigative case file, review of the ACDC website, and Atlanta Police Department website, ACDC meets all provisions of the standard.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1.City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2.ACDC #400-13.03, City of Atlanta Department of Corrections, Responding to Detainee & Staff Sexual Misconduct: Training & Education 3. ACDC PREA Lesson Plan 4. Power DMS Roster of PREA Training 5. Interviews: <ol style="list-style-type: none"> a. Training Staff b. Random and Specialized Staff <p>115.31 (a) (b) (c) In accordance with ACDC 400-13.03, All employees, volunteers, contract employees and vendors will attend training regarding PREA. This training will teach attendees how to prevent, detect, respond and report PREA incidents. Refresher training will be documented and given annually on the: ACDC's zero-tolerance policy for sexual abuse and sexual harassment ; Staff's responsibilities for the prevention, detection, response, and reporting of sexual abuse an sexual harassment; Inmates' right to be free from sexual abuse and sexual harassment ; Inmate's and staff member's rights to experience no retaliation for reporting sexual abuse and sexual harassment ; The dynamics of sexual abuse and sexual harassment in prisons and jails; How victims of sexual abuse and sexual harassment typically react ; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with inmates; How to communicate effectively and professionally with inmates in general and specifically with LGBTI detainee/inmates and who to report sexual abuse.</p> <p>Interviews were conducted by random and specialized staff with employment at ACDC ranging from two years to twenty-nine years. All staff acknowledged receiving PREA training annually during in-service. All stated the training is completed on PowerDMS. Staff identifying training topics identified within the standard provisions.</p> <p>An interview with training staff confirmed all employees to include contract staff, and volunteers are required to complete PREA training prior to having contact with the detainee population. She stated ACDC sworn officers attend an 80-hour academy training program at either the North Central Law Enforcement Academy, or Fulton County Law Enforcement Academy. Training is also held at the Georgia Public Safety Training Center for Basic Jail Training. PREA and search training is included. Refresher PREA training is required annually. The current PREA refresher training is scheduled for completion March – August. Staff have access to the PowerDMS from any computer to include from home and are required to complete the PREA training within the allotted time given. A computer room at the facility is available and the course can be completed while staff are at their desk. She stated since COVID-19, as much training as possible is being completed via computer using the PowerDMS program.</p> <p>A copy of the PREA lesson plan was provided for review and is tailored for working with both male and the female population. A copy of the 40 page PREA lesson plan presented through PowerPoint program was presented for review and included the following topics ACDC How to Prevent, Detect and Respond to Inmate Sexual Abuse; Definitions within the PREA language, ACDC zero-tolerance policy toward all forms of sexual abuse and harassment; Youthful and Adult Inmates; Video monitoring; How victims of sexual abuse and sexual harassment typically react; to avoid inappropriate relationship with inmates, how to communicate and professionally with inmate in general, specifically, LGBTI or gender non-conforming inmates; voyeurism by a staff, member, contractor, or volunteer; sexual harassment, sexual activity; adequate staffing levels, Limits to cross-gender viewing an searching; Disabled inmates and inmates with limited English proficiency; Hiring and promotions decisions; Risk of victimization, Predation; Risk Assessment; Tools used to detect sexual abuse/harassment; Behavioral indicators; Physical indicators of violent abuse; Clinical indicators; Possible indicators of staff to inmate sexual abuse; Professional boundaries in corrections; Why staff fail to maintain appropriate boundaries; Ways to avoid inappropriate relationship with inmates; Professional communication with inmates; Professional communication with LGBTI inmates; Inmate Reporting; Ways to report; Third -party reporting ;Staff and agency reporting duties; First responder to inmate sexual assault; Support services offered at initial encounter following report; Victim care; Abusers: Evaluation Victims under age 18; Reporting to other confinement facilities' Coordinated Response; Criminal and administrative agency investigations.</p> <p>A computer-generated roster from the Power DMS was presented that confirmed all ACDC staff completion and</p>

understanding the PREA training as they acknowledge in the PowerDMS.

A review of security daily assignment rosters, documents PREA training during shift briefs. Additional, PREA posters are posted throughout the facility as refresher training.

Based on the review of ACDC policy, the extensive ACDC PREA lesson plan identifying educational material in an excess of the standard provision, interviews with staff, and confirmation of PREA training generated through the PowerDMS, ACDC does meet all provisions of the standard.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ)

2. ACDC #400-13.03, City of Atlanta Department of Corrections, Responding to Detainee & Staff Sexual Misconduct: Training & Education

3. PREA Lesson Plan

4. Interviews:

a. Training Staff

b. Contractor

115.32 (a) (b) (c) In accordance with ACDC 400-13.03, All employees, volunteers, contract employees and vendors will attend training regarding PREA. This training will teach attendees how to prevent, detect, respond and report PREA incidents. Refresher training will be documented and given annually on the: ACDC's zero-tolerance policy for sexual abuse and sexual harassment; Staff's responsibilities for the prevention, detection, response, and reporting of sexual abuse and sexual harassment; Inmates' right to be free from sexual abuse and sexual harassment; Inmate's and staff member's rights to experience no retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in prisons and jails; How victims of sexual abuse and sexual harassment typically react; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with inmates; How to communicate effectively and professionally with inmates in general and specifically with LGBTI detainee/inmates and who to report sexual abuse.

The facility has one contract Keefe who has contact with the detainee population. Seven Keefe employees provide services to the detainee population. One was selected for an interview by the auditor. She indicated she has been employed with ACDC for fourteen years. Since the implementation of PREA, she receives PREA training annually through the electronic program DMS. She confirmed the training includes all provision requirements of the standard. She continued in stating; security staff are always assigned with them when they have interaction with the detainee population which is only in the housing pods She would immediately inform the present security staff of any PREA information she became aware of.

An interview with training staff confirmed all employees to include contract staff, and volunteers are required to complete PREA training prior to having contact with the detainee population. Refresher PREA training is required annually. The current PREA refresher training is scheduled for completion March – August. She stated since COVID-19, as much training as possible is being completed via computer using the DMS program. A computer-generated roster from the DMS was presented that confirmed the contract workers, completion of PREA training. A copy of the PREA lesson plan was provided for review that meets the provision of the standard.

A copy of the 40 page PREA lesson plan presented through PowerPoint program was presented for review and included the following topics ACDC How to Prevent, Detect and Respond to Inmate Sexual Abuse; Definitions within the PREA language, ACDC zero-tolerance policy toward all forms of sexual abuse and harassment; Youthful and Adult Inmates; Video monitoring; How victims of sexual abuse and sexual harassment typically react; to avoid inappropriate relationship with inmates, how to communicate and professionally with inmate in general, specifically, LGBTI or gender non-conforming inmates; voyeurism by as staff, member, contractor, or volunteer; sexual harassment, sexual activity; adequate staffing levels, Limits to cross-gender viewing and searching; Disabled inmates and inmates with limited English proficiency; Hiring and promotions decisions; Risk of victimization, Predation; Risk Assessment; Tools used to detect sexual abuse/harassment; Behavioral indicators; Physical indicators of violent abuse; Clinical indicators; Possible indicator of staff to inmate sexual abuse; Professional boundaries in corrections; Why staff fail to maintain appropriate boundaries; Ways to avoid inappropriate relationship with inmates; Professional communication with inmates; Professional communication with LGBTI inmates; Inmate Reporting; Ways to report; Third -party reporting; Staff and agency reporting duties; First responder to inmate sexual assault; Support services offered at initial encounter following report; Victim care; Abusers: Evaluation Victims under age 18; Reporting to other confinement facilities' Coordinated Response; Criminal and administrative agency investigations.

ACDC reported all volunteer services and entry into the facility was cancelled in March 2020, due to COVID-19. As of the site visit, there are no volunteers approved for entry at ACDC. The ACDC PREA Coordinator did present rosters of signatures by volunteers acknowledging PREA education from previous years. Per an interview with the Religious Services Chaplain/Program Coordinator, the return of volunteers into the facility has not been determined.

Based on the review of ACDC policy, review of the PREA education lesson plan, DMS roster identifying contract staff's completion and the acknowledgement of training and awareness of her responsibilities as a contract worker, previous acknowledgment of PREA training by volunteers, it is determined ACDC does meet all provisions of the standard.

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.03, City of Atlanta Department of Corrections, Responding to Detainee & Staff Sexual Misconduct: Training & Education 3. ACDC #200-36, Security (Self-Bond Procedures) 4. Interviews: <ol style="list-style-type: none"> a. Booking Staff b. Detainee Population <p>115.33 (a) (b) (c) (d) In accordance with ACDC #400-13.03, During the initial admission process, the facility will provide an educational program designed to prevent the occurrence of sexual assault and sexual activity. The education will include how to avoid risk situations, safely reporting sexual assault/abuse, treatment, and counseling if victimized. The information will be communicated orally and in writing in a language clearly understood by the detainee/inmate.</p> <p>Per the PAQ and interview with the ACDC PREA Coordinator and ACDC PREA Compliance Manager 9863 detainees were booked into the ACDC during the 12-month review period. and a computer-generated tracking log of the 9868 detainees who were placed in custody at the ACDC facility during the 21-month review period, 1130 were identified as remaining at the facility for 72 hours or more. However only 50 was identified with a stay of 30 days or more. In 2018, the Atlanta City Ordinance Council voted to allow most of the prisoners brought in the ACDC (who were arrested on city ordinance violations, not more serious state criminal charges) to be released without having to post a cash bail. Therefore, the arriving detainees are only charged with minor misdemeanor charges such as traffic violation, shoplifting and other misdemeanor charges (no felony charges).</p> <p>Pursuant to ACDC #200-36 Security (Self -Bond) Self-Bond is identified as Detainees released on their own recognizance signature bond. Self-bonds issued will have no dollar amount. The Chief of Corrections is responsible for the implementation of the policy. The Corrections ID Technician staff shall conduct a GCIC Wanted Person Check (QX) to ensure the detainee does not have a warrant or on Probation/Parole or Sex Offender. Bond surrender will be eligible for a self-bond if the charge(s) applies. Of the 9863 detainees entering ACDC, and 1130 remaining for 72 hours or more, the facility identified 50 whose stay was for 30 days or more.</p> <p>Interviews conducted with two Corrections ID Technicians staff (Booking), all arrivals are given verbal PREA Information and shown the educational PREA video during the booking process regardless of their immediate release following the booking and posting a self-bond. The auditor observed the PREA video continuously played in the intake and booking areas, throughout the site visit during the various shifts on both days. Upon the completion of the booking process, observance of the PREA video and further PREA education presented by the booking staff, the detainee electronically acknowledges receipt of PREA training by signature with the date electrical captured. The electronic program also captures the staff's member name as presenting the PREA education to the detainee.</p> <p>Sixteen detainees were selected for random interviews and one detainee was interviewed who reported prior sexual victimization was interviewed. These detainees included arrivals within 24 -hours and not longer than two weeks. There were no detainees who had been at the facility for 30 days or more during the site visit. All detainees interviewed confirmed they observed the PREA video presentation during the intake and booking process, the PREA education included ways to report by staff during the booking process and observing the PREA posters with information on how to report. All detainees were aware they could report to a staff member, and/or dial the Hotline number posted on the detainee's phone *222. The information is issued and posted in English and Spanish and is available upon request in other languages. This number was tested by the auditor during the site visit with no discrepancies noted in the opportunity to report an allegation.</p> <p>The auditor randomly selected 40 detainees for confirmation of receiving PREA education. Confirmation was identified through the signature of the detainee on the computer generated "Inmate PREA Orientation Acknowledge." The form is as the following: "I, electronically filled inmate's name is inserted, have received inmate orientation related to the PREA Rape Elimination Act (PREA). My signature acknowledges that I understand the Atlanta City Detention Center's zero tolerance policy for sexual abuse and sexual harassment and how to report any incident or suspicion of sexual abuse and sexual harassment." The inmate inserts his/her signature as their booking number and date of the arrest is electronically inserted.</p>

Inmates with learning disabilities are given the opportunity to view videos separately from other inmates and at a pace suited to their ability to comprehend the information. Additionally, Inmate Services staff may be notified to assist with the inmates' learning needs. The PREA video is available in both English and Spanish. There were no detainees housed at ACDC identified as Limited English Proficient during the review period to include during the site visit to conduct an interview.

Detainees/ inmates in the general population will also receive the Department's inmate handbook which contains additional information via housing unit commissary kiosk. The procedure was observed during the site visit.

Information shall be provided to inmates about sexual abuse/assault including prevention/intervention; self-protection; reporting sexual abuse/assault; treatment and counseling. The information shall be communicated orally and in writing, in a language clearly understood by the detainee, upon arrival.

Based the review of ACDC policy, observation during the site visit, PREA posters, and educational materials provided to the detainee population, observation of PREA video shown continuously in intake/booking and the medical department, interviews with staff and the detainee population, confirmation of inmates' receipt of PREA education and their awareness during the interview process n how to report PREA allegations, it is determined that ACDC does meet all provisions of the standard.

115.34	Specialized training: Investigations
	<p data-bbox="240 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 239">Auditor Discussion</p> <p data-bbox="240 271 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 329 1490 562" style="list-style-type: none"> <li data-bbox="240 329 1190 358">1.City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="240 387 1490 448">2.ACDC #400-13.03, City of Atlanta Department of Corrections, Responding to Detainee & Staff Sexual Misconduct: Training & Education <li data-bbox="240 477 368 506">3. Interview: <ol data-bbox="240 535 863 564" style="list-style-type: none"> <li data-bbox="240 535 863 564">a. ACDC Office of Professional Standards (OPA) Investigators <p data-bbox="240 593 1490 719">115.34 (a) (b) (c) (d) Pursuant to ACDC #400-13.03, In addition to the general training required for all employees, ACDC investigators will receive specialized training pertaining to conducting investigations in a confinement setting, The training will consist of: a) Techniques for interviewing and sexual abuse victims; b) Proper use of Garrity warnings; c) How to preserve and safeguard evidence after sexual abuse incidents; d)What criteria and evidence are needed to substantiate a case.</p> <p data-bbox="240 748 1461 1043">An interview was conducted with an Office of Professional Standards (OPA) Investigator who is assigned to conduct administrative investigation for the facility to include sexual harassment and sexual abuse. She explained the OPA Investigators are required to complete the "PREA: Conducting Sexual Abuse Investigations in a Confinement Setting" presented by the National Institute of Corrections Academy Division. The training included the the nine 9 modules. The PREA Update and Standards Overview; Legal Issues and Liability; Culture; Truman and Victim Response; First Response and Evidence Collection; Adult Interviewing techniques; Juvenile Interviewing Techniques; Reporting Writing and Prosecutorial Collaboration. There are two OPA Investigators assigned at ACDC and certificates of completion for the required training were submitted for review in addition to the completion of an advance training course. Certificates of completion were also presented for previously assigned OPA Investigators.</p> <p data-bbox="240 1072 877 1102">Additionally, OPA Investigators completed the the are req IN aT</p> <p data-bbox="240 1131 1382 1225">The Atlanta Police Department Special Crime Victims Unit is the outside entity responsible for conducting criminal investigations of sexual abuse and sexual harassment at ACDC. The training requirement for this unit exceeds the requirement of this standard.</p> <p data-bbox="240 1254 1490 1413">Based on the review of ACDC policy, interview with the OPA Investigator and review of certificates of completion for "PREA: Conducting Sexual Abuse Investigations in a Confinement Setting" and "PREA: Conducting Sexual Abuse Investigations in a Confinement Setting; Advanced" presented by the National Institute of Corrections Academy Division, and the assignment of criminal investigation to the Atlanta Police Department Special Crime Victims Unit, ACDC does meets all provisions of the provision.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.03, City of Atlanta Department of Corrections, Responding to Detainee & Staff Sexual Misconduct: Training & Education 3. Interviews: <ol style="list-style-type: none"> a. ACDC Medical Doctor b. ACDC Mental Health Administrator <p>115.35 (a) (b) (c) (d) Pursuant to ACDC #400-13.03, In addition to the general training required for all employees, ACDC medical and mental health care staff will receive specialized training. The training will consist of: How to preserve physical evidence of sexual abuse; How to respond effectively and professionally to victims of sexual abuse and sexual harassment; How to an whom to report allegations of suspicion of sexual abuse and sexual harassment. The thirteenth staff assigned to the medical and mental health department each completed the Specialized training presented by the Moss Group.</p> <p>The ACDC Director of Nurses also presented the receipt of PREA Specialty Training for Medical, and Mental Health Staff presented by American Correctional Association (ACA) Congress of Correction. The training course includes; Detection - Screening at Arrival; Clinical Indicators of Sexual Abuse; Health care PREA Training Goas; Gender Screening; General Injuries – Sexual Violence; Behavior Observations – Sexual Abuse; Effective Response; Chemical Changes in Stress; Reporting – When Abuse is Suspected; Effective Response -Professionalism; Key Structures Affected Extreme Effects; Healthcare Professional Should; Access to Emergency Medical and Mental Health Care; Normal Response; Preserving Evidence - Avoid 'Brief Assessment -Stabilization & Transfer for Outside Exam/Care, Access to Outside Confidential Services; Forensic Medical Exam (SANE); Access to Outside Confidential Services – Agreements; Role of the Advocate During the Forensic Exam; What does a Sexual assault examination entail, and the collection and preservation of physical evidence.</p> <p>The ACDC Doctor and Mental Health Administrator both indicated forensic examinations are not conducted at the ACDC. These examinations are completed at the Grady Rape Crisis Center as identified in a Memorandum of Understanding</p> <p>An electronic roster identifying the medical and mental health staff's completion of the PREA Specialized Training was submitted for review in addition to the completion of regular PREA education training pursuant to standard 115.31.</p> <p>Based on the review of ACDC policy, PREA Specialized Training Lesson plans, roster identifying staff completion of training, and interviews with mental health and medical staff, it is determined ACDC does meet all provisions of the standard.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 208 451 235">Auditor Discussion</p> <ol data-bbox="240 271 1406 562" style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.06P, City of Atlanta Department of Corrections, Lesbian, Gay, Bisexual, Transgender, and Intersex (LGBTI) 3. ACDC #400-13.04 Responding to Detainee & Staff Sexual Misconduct: Screening 4. ACDC #200-36 Security Self-Bond Procedures 5. Observation During Site Visit <p data-bbox="240 593 379 620">4. Interviews:</p> <ol data-bbox="240 651 668 790" style="list-style-type: none"> a. Staff assigned to conduct risk screening b. Intake Staff c. Detainees <p data-bbox="240 822 1493 983">115.41 (a) (b) (c) (d) (e) (f) (g) (h) In accordance with ACDC #400-13.04, Intake screening shall take place within 8 hours of admittance to the facility. All detainees will be screened within eight (8) hours admittance to the facility for potential vulnerabilities or tendencies of acting out with sexually aggressive behavior during the inmate medical screening. The Jail Management System (JMS) will be check for any prior flags pertaining to sexual abuse during initial intake medical screening. Housing assignments will be made accordingly.</p> <p data-bbox="240 1014 1466 1075">Pursuant to #400-13.06P, in accordance with the appropriate department procedures and PREA standards, all inmates will be screened at Intake for risk for being sexually abuse by other inmates or being sexually abusive toward other inmates.</p> <p data-bbox="240 1106 1481 1332">Such assessments shall be conducted using an objective screening instrument. The intake screening shall consider, at a minimum, the following criteria to asses inmate for risk of sexual victimization: a) Whether the inmate has a mental, physical, or developmental disability; b) The age of the inmate; c) Whether the inmate has previously been incarcerated; e) Whether the inmate's criminal history is exclusively nonviolent; f) Whether the inmate has prior conviction for sex offenses against an adult or child; g) Whether the inmate is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; h) Whether the inmate has previously experienced sexual victimization; i) The inmate's own perception of vulnerability; and j) Whether the inmate is detained solely for civil immigration purposes.</p> <p data-bbox="240 1364 1426 1424">The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, a s known to the agency, in assessing inmates for risk of being sexually abusive.</p> <p data-bbox="240 1456 1485 1547">Interviews were conducted with 16 randomly selected detainees and 1 detainee who reported prior sexual victimization. These detainees' housing at the ACDC was less than two weeks. All acknowledged the screening process questions entitled during the initial medical intake.</p> <p data-bbox="240 1579 1493 1906">Per the PAQ and interviews with the ACDC PREA Coordinator and ACDC PREA Compliance Manager and a computer-generated tracking log of the 9868 detainees who were placed in custody at the ACDC facility during the 21-month review period, 1130 were identified as remaining at the facility for 72 hours or more. Due to the Atlanta City Ordinance implemented in 2018, detainees arrested for minor misdemeanor (no felony charges) may be eligible for a no cash self-bond which awards them the opportunity for immediate release. In the circumstances, upon the Corrections ID Technician verifying through the jail management system that the detainee does not have any open cases and/or valid warrants, the arrestee may be released on a signature bond. Bond surrenders are also eligible for self-bond if the charge(s) applies. The average daily detainee population at ACDC since 2018, has been 46. Detainees arrested for criminal charges are not taken to ACDC. Per interviews with the ACDC PREA Coordinator, and ACDC PREA Compliance Manager, the facility has a detainee return rate of 46% as h many detainees identified as homeless and/or with mental health issues.</p> <p data-bbox="240 1937 1481 2161">The ACDC operates 24/7 for the processing of arrested detainees. Per interviews with the intake and booking staff, and observation during the site visit, risk screening is conducted within minutes of the detainee's arrival. Per the intake medical staff, numerous detainees refuse to participate in the medical intake and/or responses to the intake questions as several are being released on signature bond within hours of arrival. The screening process was observed during the site visit. The Intake Nurse is responsible for conducting the initial risk screening and are scheduled 24/7 due to the continuous traffic of arrival detainees. Per the intake medical staff, numerous detainees refuse to participate in the medical intake and/or responses to the intake questions as several are being released on a signature bond within hours of their arrival. The risk</p>

screening form takes into consideration at a minimum the following criteria during the assess of detainees, former victim of jail/prison rape or sexual assault ; youthful age 21 and under; Elderly – 65 or older; small physical stature; development disability/mental health disability; first incarceration /prior incarceration; homosexual/Bisexual /transgender; history of any sexual abuse; history of correctional facility consensual sex; history of protective custody; inmate expresses significant fears of vulnerability; possible victim factors; possible predatory factors; history of institution predatory sexual behavior; any history of sexual abuse/assault or physical abuse/assault; convicted offenses; current gang affiliation or security threat group; history of strong-arming/assaults in jail/prison; history of correction facility consensual sex. ACDC does hold detainees solely for the purpose or immigration and does not include this question in the screening process. Forty risk assessment screenings were randomly selected for review. The review confirmed all detainees were screened on the day of their arrival.

The Classification Officer identified her department as responsible for conducting the re-assessments of detainees. Detainees held for pre-trial are normally the only detainees whose length of stay may exceed 30 days. An inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmates' risk of sexual victimization or abusiveness.

Per the PAQ and interviews with the ACDC PREA Coordinator and ACDC PREA Compliance Manager, 50 detainees were assigned to the ACDC for 30 days. However, this count includes detainees who were arrested within the local community but were immediately transported to a medical facility due the extent of injuries upon being arrested and remained there for a period of time as determined by the local hospital medical staff. Therefore, several were not physically housed at the facility for 30 days or more. On the first day of the site visit, three detainees were included in the ACDC count but was immediately transported to the Grady Hospital upon arrested and had not reported to ACDC. The Classification Officer conduct the re-assessments utilizing the Classification Questionnaire. She stated the average length of stay for detainees at the facility is 4 to 5 days. The self-bond (signature) ordinance allows the detainees to self-body via signature only without the payment of funds due to their misdemeanor charges. Detainees who are required to pay a bond are those who may have missed a court date and have a failure to appear and or are pre-trial. All detainees continue to be housed in single cells throughout the stay at ACDC. The auditor randomly selected five re-assessments for confirmation of completion. There were zero detainees housed at ACDC who stay was 30 days or more during the site visit to interview.

ACDC recently reassigned the responsibility of conducting a reassessment of the detainees who remain at the facility 14 days or more to the medical doctor who is required to see all detainees on the 14th day after arrival. Medical staff receives an alert at the 10th the detainee has been housed at ACDC. The detainee is reassessed not later than the 14th day. These assessments are completed in addition to the Classification Officer. Within a set time, not to exceed 30 days from the inmates' admittance to the facility, the facility will reassess the inmates' risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. Screening staff receive an alert from within the screening program on the eleventh day of a detainee's arrival at ACDC, the reassessment is to be completed not later than the 14th day of his/her arrival.

Interviews with staff assigned to conduct the initial and reassessment risk screening, a vast majority of detainees refuse to participate while their concern is completing the self-bond that allows their release without a financial obligation but via signature only. Both confirmed that detainees who refuse to respond are never disciplined for refusing to answer questions and all detainees have been placed in single cells since March 2020 due to COVID-19. The facility has a rated capacity rate of 1314 and an operational rate of 1183. Upon the auditing team arrival at the facility, 59 detainees were assigned to the facility. At the end of the first day visit, the detainee count was 41. Since 2018, the average daily detainee count has been 46 or less.

Mental health conducts an assessment of all detainees on the day of their arrival or the following day and always within 24 hours of their arrival.

Inmates may not be disciplined or punished (through self-report of information received from staff or other inmates) for refusing to answer, or for not disclosing complete information in response to questions asked pursuant to the standard. Interviews with staff who conduct risk screening, confirmed it is normal for the detainees to refuse to participate in responding with the intake/risk screening process as most are concerned with their right to post the self/signature bond and being released within hours of their arrival. None are disciplined for their refusal. The

The agency shall implement appropriate controls on the dissemination within the facility of responses to the questions asked in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates.

Based on the review of ACDC policy, review of randomly selected risk assessment screenings and reassessments, interviews with staff who conduct risk screenings, and randomly selected detainees, and observation of the intake and risk screening process, ACDC does meet all provisions of the standard.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.06P, City of Atlanta Department of Corrections, Lesbian, Gay, Bisexual, Transgender, and Intersex (LGBTI) 3. ACDC # 400-13.04, Responding to Detainee & Staff Sexual Misconduct: Screening 4. Observation During Site Visit 5. Interviews: <ol style="list-style-type: none"> a. ACDC PREA Coordinator b. ACDC PREA Compliance Manager c. Staff who conduct risk screening d. Random staff <p>115.42 (a) Pursuant to ACDC 400-13.06, The agency shall use information from the risk screening required herein to determine housing, bed, work detail, educational, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Per interviews with the ACDC PREA Compliance Manager and Staff assigned to conduct risk screening, all detainees are housed in single cells which increases the prevention of sexual abuse/assault. Additionally, the Jail Management System (JMS) will flag detainees identified as high risk of sexual assaultive behavior and sexual victims and the assignment would not be completed. Detainees are not assigned to program areas and other work assignments which were confirmed through interviews and observation during the site visit.</p> <p>115.42 (b) The agency shall make individualized determination about how to ensure the safety of each inmate. Staff are required to make an individualized housing assessment of reach transgender intersex and gender nonconforming inmate. The assessment shall be based on the safety of the inmate, security of the facility and the inmates' own views regarding housing safety. If a transgender inmate has had a sex reassignment surgery, such that at the inmate's sex is consistent with the inmate gender identity, staff may consider placing the inmate in the appropriate unit of other inmates of the same sex.</p> <p>115.42 (c) In accordance with ACDC 400-13.06 In deciding whether to assign a transgender or intersex inmate to a pod for a male or female inmate, and in making the housing and program assignments, the agency shall consider or a case-by -case basis whether a placement would ensure the inmates' health and safety, and whether the placement would present management for security problems. An interview the ACDC PREA Compliance Manager indicated, when an inmate arrives at the facility and identified as transgender and/or intersex, the inmate is asked where they would feel comfortable in staying within the facility (gender and housing). A notification is forwarded to staff that a transgender is assigned at the facility and they are to be housed alone throughout their stay. No inmates identified as transgender and/or intersex were housed at ACDC during the site visit.</p> <p>115.42 (d) Pursuant to ACDC 400-13.06, Placement and programming assignment for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to the safety or the inmate. Interviews with the ACDC PREA Coordinator and staff who conduct risk screening confirmed transgender and intersex inmates would be reassessment bi-annually. However, there were zero inmates identified as transgender and/or intersex housed at ACDC in an access of a week.</p> <p>115.42 (e) In accordance with ACDC 400-13.06, A transgender or intersex inmate's own view with respect to this or her won safety shall be given serious consideration. Interviews conducted with staff who conduct risk screening</p> <p>115.42 (f) Pursuant to ACDC 400-13.06, All inmates shall be given the opportunity to shower in a separate shower stall from other inmates. Transgender and intersex inmate will be given the opportunity to shower separately from other inmates while placing other inmates in their cells during the showering of transgender and/or intersex inmates. There were no inmates at ACDC during the site visit identified as transgender and/intersex to complete an interview. However, interviews with random staff, ACDC PREA Coordinator, and staff assigned to conduct risk screening confirmed inmates as such would be given the opportunity to shower at a separate time from other inmates who would be restricted to their cells.</p>

115.42 (g) The agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely based on such identification or status. There were no inmates identified as gay, bi-sexual, lesbian, transgender and/or intersex to conduct an interview during the site visit. However, the review of previous housing assignments and interviews with the ACDC PREA Coordinator and ACDC PREA Compliance Manager confirmed there was no dedicated housing for such inmates.

Based on the review of ACDC policy, previous housing assignments of inmates identified as transgender, observation of single cell assignments throughout the facility, and confirmation that the inmate population are not assigned to program and work assignments and interviews with staff, ACDC meets all provisions of the standard.

115.43	Protective Custody
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.06P, City of Atlanta Department of Corrections, Lesbian, Gay, Bisexual, Transgender, and Intersex (LGBTI) 3. Observation During Site Visit 4. Interviews: <ol style="list-style-type: none"> a. Chief of Corrections b. Staff assigned to supervise segregation <p>115.43 (a) (b) (c) (d) (e) Pursuant to ACDC #400-13.6P, Inmates at high risk for sexual victimization shall not be placed in involuntary segregation unless an assessment of all available alternative has been made, and a determination has been made that there is no available alternative means for separation from likely abuser. If a facility cannot conduct such assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>Inmates placed in segregated housing for this purpose, shall have the same access to programs, privileges (including, but not limited to, visitation, telephone, and mail,) education, and work opportunities as non-segregated inmates to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: a) The opportunities that have been limited; b) The duration of the limitation and: c) The reasons for such limitations.</p> <p>The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged and such an assignment shall not ordinarily exceed a period of 7 days. If an involuntary segregated housing assignment is made, the facility shall clearly document: 2) The basis of the facility's concern for the inmate's safety; and b) The reason why no alternative means of separation can be arranged. Every 7 days the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.</p> <p>Interviews conducted with the Chief of Corrections and staff assigned to supervise segregation confirmed the facility does not place detainees in involuntary segregation for being at risk of sexual victimization at ACDC. The facility has a capacity rate of 1314 and an operational rate of 1183 detainees. The average daily detainee population has been 46 since 2018 due to detainees being eligible for no cash self-bond and only placed in lockup at the ACDC for minor misdemeanor violations such as traffic citations, shoplifting, or held short-term for a county law enforcement transfer, probation violation and/or pre-trial. Such detainee or the identified aggressor would be relocated to another housing unit. There have not been any detainees identified as at risk of sexual victimization at ACDC within the past 12-month review period. However, procedures outlined in ACDC policy would always be eliminated.</p> <p>Based on the review of ACDC policy, observation during the site visit, interviews with the Chief of Corrections, and staff assigned to supervise segregation, ACDC meets all provisions of the standard.</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13-05, Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations 3. ACDC ##400-13, Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities 4. PREA Hotline Number Postings 5. PREA Posters 6. Interviews: <ol style="list-style-type: none"> a. Random and Specialized Staff b. Random and Targeted Detainees c. ACDC PREA Compliance Manager <p>115.51 (a) In accordance ACDC #400-13-05, the facility has several internal ways for inmates to privately report sexual abuse and harassment including, a dedicated internal reporting hotline (*222), self-reporting to any ACDC staff member, and third-party reporting. Ways to reported sexual abuse or sexual harassment are also detailed in the detainee's handbook. The detainee/inmate handbook states the inmate can report a sexual assault by: a) Telling any staff person; b) File an emergency grievance stating the nature of your problem; c) Contact your boarding agency directly, using the appropriate request form; d) Contact outside hotline or dialing *222 (free in -house hotline). Interviews with random and specialized staff indicated inmates can report to any staff member, or report via the PREA Hotline *222 posted on the detainee's telephone. Sixteen random detainees were selected for an interview. All were recently admitted to the facility not to exceed three days due to the operational structure of the agency and the opportunity for a cash free self-bond. These detainees were aware that they had observed the PREA video during the intake/booking process and was informed on various ways to report sexual harassment and sexual abuse by staff during the intake process. All stated they could report to a staff member and or the *222 phone number posted on the detainee's telephone.</p> <p>115.51 (b) ACDC #400-13-05 identifies inmates can contact the Grady Rape Crisis Center confidential hotline to report any instance of sexual abuse or sexual harassment. The confidential hotline to report any instance of sexual abuse or sexual harassment at the Rape Crisis Center Hotline located at 80 Jesse Hill Jr., Dr. SE Atlanta, GA 30303, phone number listed as (404) 616-4861 and is open Sunday – Saturday 24 hours. Interviews with random and specialized staff identified the PREA Hotline *222, as method available to the detainee population to report allegations of sexual abuse and/or sexual harassment. Staff was also aware of the available Grady Rape Crisis Center for detainees to report sexual abuse and sexual harassment. Interviews conducted with detainees revealed they were knowledgeable of PREA as it was discussed with them during the intake/booking process. However, the detainees interviewed had only been assigned at the facility less than two weeks, all acknowledged the PREA video was played during the intake/booking process, the hotline number on the inmate phones and posted on walls, the option to report to staff. All stated they would report any circumstances as such to a staff member. An interview with the ACDC PREA Compliance Manager, the Grady Rape Crisis Center is an available resource for detainees to report PREA allegations that is a private entity that is not part of the ACDC. She added this information is posted in each of the detainee's housing units as was observed during the site visit. Upon the detainee's approval, the information would be shared with the OPA, and ACDC PCM.</p> <p>ACDC #400-13-05 also identifies upon receipt of an alleged sexual assault or abuse submitted by an ICE detainee, the ICE detainee will be given a folded "Detainee Assistance Alternative Flyer." (English and Spanish). ICE Detainees ONLY may file a complaint about staff misconduct, sexual assault or sexual harassment with the U.S. Department of Homeland Security, Office of the Inspector (OIG): Email at DHSOIGHOTLINE@DHS.GOV – call 1-800-323-8603 – write at no cost to you: DHS OIC HOTLINE 245 Murray Drive, SE Building 410 Washington DC 20535. However, ACDC does not hold inmates for ICE. The contract for ACDC to house ICE immigrants was terminated in 2018.</p> <p>115.51 (c) City of Atlanta Department of Corrections 400-13 identifies it is the responsibility of all employees to promptly report sexual abuse, sexual activity, or staff sexual misconduct. Failure to do so may result in disciplinary action up to and including dismissal. Policy also identifies it is responsibility of all volunteers, contractors, or agents to promptly report sexual</p>

abuse, sexual activity or staff sexual misconduct. Failure to do so may result in corrective action up to, and including, termination of services or cancellation of contract. City of Atlanta Department of Corrections 400-13-05 identifies staff shall accept reports made: a) Verbally (must document immediately); b) In writing; c) Anonymously; d) From a third-party (i.e., someone other than the victim). Interviews with random and specialized staff indicated they would document any and all information they received and/or became aware of regarding PREA allegations immediately upon becoming aware regardless of the circumstances in which the allegation was reported.

115.51 (d) City of Atlanta Department of Corrections 400-13-05, states staff may privately report sexual abuse/harassment of inmates to their immediately supervisor or directly to the Office of Professional Accountability (OPA). Interviews conducted with both random and specialized staff confirmed their awareness of how to privately report allegations of sexual abuse and/or sexual harassment. Staff indicated they could privately report PREA allegations by directly contacting their supervisor to include via email, phone or reporting to their office, and/or reporting to the Office of Professional Standards (Facility Investigators).

Based on the review of the agency's policies, interviews with random and specialized staff, detainees, the PREA Compliance Manager and PREA Coordinator, Hotline phone number posted on the detainees' phones and posters in addition to other methods in how to report PREA allegations, ACDC does meet all provisions of the standard.

115.52	Exhaustion of administrative remedies
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 327 1458 506" style="list-style-type: none"> <li data-bbox="242 327 1193 356">1. City of Atlanta Department of Corrections (ACDC) Completed Pre-audit Questionnaire (PAQ) <li data-bbox="242 383 1458 450">2. City of Atlanta Department of Corrections #400-13-05, Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations #400-13-05 <li data-bbox="242 477 496 506">3. Investigative Case File <p data-bbox="242 533 1474 734">115.52 (a – g) In accordance with #400-13-05, the department will allow inmates a full and fair opportunity to file grievances regarding sexual abuse so as to preserve their ability to seek judicial redress after exhausting administrative remedies. An inmate who alleges sexual abuse may submit a grievance without a time limit submitting it to staff member, who is not the subject to the complaint. The department shall issue a final decision on merits of any portion of a grievance alleging sexual abuse within 90 days or the initial filing of the grievance. Computation of the 90-day period shall not include time consumed by the inmate in preparing any administrative appeal.</p> <p data-bbox="242 761 1449 920">The department may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make any appropriate decision. The department shall notify the inmate in writing of any such extension and provide a date by which a decision will be made. At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate may consider the absence of a response to be denial at that level.</p> <p data-bbox="242 947 1481 1149">Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall be permitted to file such requests on behalf of inmates. If a third-party file such a request on behalf of an inmate, the department shall require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf and shall also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process. If the inmate declines to have the request process on his or her behalf, the department shall document the inmates' decision.</p> <p data-bbox="242 1176 1465 1243">When an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse, the Watch Commander or designee will immediately respond to the grievance. A final decision shall be issued within five (5) days.</p> <p data-bbox="242 1270 1294 1299">The department will discipline an inmate for filing a grievance related to alleged sexual abuse in bad faith.</p> <p data-bbox="242 1326 1481 1527">The ACDC PAQ identified in the past 12-months of the review, one sexual abuse allegation was reported through the grievance process. However, a review of the one reported PREA allegation investigative file, confirmed this information was incorrect. There were 0 reported allegations of sexual abuse at the facility during the 12-month review period to include reported via the grievance process. There was one staff on inmate sexual harassment allegation reported. This allegation was not reported via the agency's grievance process. The alleged victim reported his allegation of sexual harassment via an Inmate Request Form only.</p> <p data-bbox="242 1554 1493 1644">Based on the review of ACDC policy that outlines the procedures in which an allegation of sexual abuse may be reported through the grievance process and confirmation that there has not been an allegation reported through the grievance process for review by the auditor, it is determined, ACDC meets all provisions of this standard.</p>

115.53	Inmate access to outside confidential support services
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 329 1474 618" style="list-style-type: none"> 1. City of Atlanta Department of Corrections PAQ 2. City of Atlanta Department of Corrections Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations #400-13-05 3. MOU Between ACDC and Grady Rape Crisis Center 4. Observation During Site Visit 5. Testing of Confidential Phone Line <p data-bbox="242 649 352 678">Interviews:</p> <ol data-bbox="242 705 612 790" style="list-style-type: none"> a. Grady Rape Crisis Center Director b. Detainees <p data-bbox="242 819 1474 1016">A memorandum of Understanding Between the City of Atlanta on Behalf of The City Detention Center and Grady Rape Crisis Center (RCC) was signed by the President Chief Executive Officer Grady Hospital on April 15, 2015, and the Chief of City of Atlanta Department of Corrections on April 20, 2015. As the Director to the Grady Rape Crisis Center was replaced, the current Director acknowledged the MOU as effective on June 1, 2022. The MOU was developed in an intent to make available to any inmate victim of a sexual abuse incident, as defined by the ACDC policy, access to outside confidential support services.</p> <p data-bbox="242 1046 1474 1137">Responsibilities of the RCC is defined as provide to ACDC staff/inmates the RCC mailing address and crisis line number so that inmates may contact RCC if they wish to receive support and/or advocacy services related to a sexual abuse incident that occurs at ACDC.</p> <p data-bbox="242 1167 1474 1258">Support and advocacy services are available to inmates who report a sexual abuse incident occurring at ACDC. Confidential 24-hours crisis line support, hospital accompaniment (at Grady Hospital). RCC's staff will answer written correspondence from inmate victims. In addition RCC will provide support services and referrals as needed and requested.</p> <p data-bbox="242 1288 1474 1485">Interviews were conducted with the Grady Rape Crisis Center Director. She acknowledged detainees are allowed to call the center for advocate services as a listener is scheduled 24/7. She also acknowledged RRC staff are required to receive authorization from the caller prior to releasing any information shared to include reported allegations of sexual abuse. Detainees have access to utilize the inmate phones by calling *222. This number was observed during the site visit posted on each inmate phone and identified as a confidential call to report allegations of sexual abuse and sexual harassment. The auditor conducted a test call and confirmed the identified service was available, confidential and not recorded.</p> <p data-bbox="242 1514 1474 1579">Per interviews with staff assigned to the ACDC mailroom, all detainee mail is sealed prior to placement in the outgoing mail, that allows confidential reporting to agencies such as the Grady Rape Crisis.</p> <p data-bbox="242 1608 1474 1767">Interviews with the detainee population confirmed they were aware of the phone number listed on the detainee's phone as an outside confidential resource, as it was visible to all. However, they expressed no additional knowledge of services available. The detainees housed at ACDC during the site visit were identified as being assigned there within 24 hours to approximately two weeks. There were no detainees at ACDC who reported sexual abuse during the review period and/or during the site visit for interview.</p> <p data-bbox="242 1796 1474 1888">Based on the review of the MOU between the ACDC and Grady Rape Crisis Center that offer confidential outside facility reporting procedures, interviews with the Grady Rape Crisis Center Director, and the testing of the detainees' phone confidential reporting line, ACDC meets all provisions of the standard.</p>

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1509 255">Auditor Discussion</p> <p data-bbox="229 255 1509 318">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="229 318 1509 416" style="list-style-type: none"> <li data-bbox="229 318 1509 358">1. Atlanta City Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="229 358 1509 416">2. ACDC #400-13-05 Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations <p data-bbox="229 416 1509 582">115.54 (a) Pursuant to ACDC #400-13-05, Third-party reporting may be made to Grady Rape Crisis Center at 404-616-4861 address 80 Jesse Hill Jr. Drive SE Atlanta, GA 30303 and the Office of Professional Accountability (OPA) at 404-954-8485 or in writing to the City of Atlanta Department of Corrections, Office of Professional Accountability and Training, 254 Peachtree Street SW, Atlanta, GA, 30303.</p> <p data-bbox="229 582 1509 761">A review of the agency' website, https://www.atlantaga.gov/government/departments/corrections provides information for third party reporting to the public that states "If you or someone you know would like to report an allegation of sexual abuse, sexual activity or sexual misconduct involving a detainee(s) (currently or previously incarcerated) and/or a Department of Corrections staff members(s), please contact the City of Atlanta Department of Corrections Office of Professional Accountability at 404-954-8485."</p> <p data-bbox="229 761 1509 869">Based on the review of the agency's website that allows individuals to report allegations of sexual abuse, and third party reporting available through the Grady Rape Crisis Center, it is determined ACDC meets the provision of this standard.</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 812 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 329 1393 757" style="list-style-type: none"> <li data-bbox="240 329 794 356">1. ACDC Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="240 387 1393 414">2. ACDC Responding to Detainee & Staff Sexual Misconduct: Responding to Inmate Sexual Assault #400-13-02 <li data-bbox="240 445 416 472">3. Interviews: <ol data-bbox="240 504 619 757" style="list-style-type: none"> <li data-bbox="240 504 491 530">a. ACDC Medical Doctor <li data-bbox="240 562 619 589">b. ACDC Mental Health Administrator <li data-bbox="240 620 539 647">c. ACDC Chief of Corrections <li data-bbox="240 678 523 705">d. ACDC PREA Coordinator <li data-bbox="240 736 560 763">e. Random and Specialize Staff <p data-bbox="240 846 1485 1173">115.61 (a) The City of Atlanta Department of Corrections #400-13-02, requires all staff to report immediately and according to departmental policy: a) Any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurs in a facility, whether the incident happened within this facility or another facility. Staff should also report immediately any knowledge, suspicion, or information regarding an incident of inmate asexual activity or any other form of sexual misconduct. B) Retaliation against inmates or staff who reported such an incident. c) Any staff neglect or violation of responsibilities may have contributed to an incident or retaliation. d) Detection of sexual abuse requires awareness by staff of institutional and housing unit climate and the characteristics and behaviors for individual inmates. Interviews with both random and specialized staff indicated all staff to include contactors, sworn and civilians are required to report information of sexual abuse and/or sexual harassment. Staff are required to report to their next in line supervisor, followed by the next ranking security supervisor such as the Lieutenant and/or Captain.</p> <p data-bbox="240 1205 1485 1364">115.61 (b) Pursuant to the City of Atlanta Department of Corrections #400-13-02, the sharing of information about specific incidents of sexual assault, sexual activity and staff sexual misconduct should be limited to those who need to know to make treatment, investigation and other security and management decisions. Interviews with random staff indicated they would share knowledge of PREA incidents with only staff with a need to know such as their supervisors. The received information would be documented but the information would not be noted in log books that are accessible to everyone.</p> <p data-bbox="240 1395 1485 1657">115.61 (c) Pursuant to the City of Atlanta Department of Corrections #400-13-02, medical and mental health practitioners are required to report sexual abuse and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality at the initiation of services. Interviews were conducted with mental health and medical staff. Per the medical doctor, he advises all detainees at the initiation of services confidential limitation and his duty to report and at the existence of reportable incidents he is required to report to the appropriate authorities. He stated outside medical staff, he only discloses information on a need-to-know basis. He is required to report all allegations of sexual abuse and sexual harassment to the Chief of Corrections, ACDC PREA Coordinator and his direct supervisor (Major over the medical department). He concluded in stating, of this 15-year tenure at ACDC, he has not been directly informed of an allegation of sexual abuse.</p> <p data-bbox="240 1688 1485 1848">An interview with the Mental Health Administrator indicated mental health staff disclose the limitations of confidentiality and their duty to report at the initiation of services to the detainee population. She added the mental health staff are mandated to report sexual abuse that occurred at the facility in addition to other required reporting events. She would report directly to the security supervisor in charge upon receiving the information. She concluded in stating; she has not been informed of a sexual abuse allegation occurring at the facility during her tenure of 5 years.</p> <p data-bbox="240 1879 1485 2107">115.61 (d) In accordance with the City of Atlanta Department of Corrections #400-13-02, if the alleged victim is under the age of 18, the department will report the allegations to the Division of Family and Children's Services (DFCS) Child Protective Services (CPS) unit, and the Fulton County CPS Central Intake Center number at (855-422-4453. Per interviews with the Chief of Corrections, and ACDC PREA Coordinator, both stated upon notification of alleged victim under the age of 18, and/or vulnerable person, an immediate notification would be made to the Atlanta Police Department and the Department of Family and Children Services and other required agencies. The facility would complete an administrative investigation only. A criminal investigation would be conducted by the Atlanta Police Department Special Victims Crime Unit .</p> <p data-bbox="240 2139 1445 2166">115.61 (e) As noted in the City of Atlanta Department of Corrections #400-13-02, Allegations of sexual abuse and sexual</p>

harassment, including anonymous and third-party reports, will be reported to investigator in the department's Office of Professional Accountability (OPA). An interview with Chief of Corrections indicated all allegation of sexual abuse and sexual harassment, to include third-party and anonymous reports are referred to the OPA for administrative investigations and the Atlanta Police Department for criminal investigation by the Special Victims Crime Unit.

Based on the review of ACDC policy, interviews with medical and mental health staff, Chief of Corrections, ACDC PREA Coordinator, it is determined that ACDC meets all provisions of the standard.

115.62	<p>Agency protection duties</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13-02, Responding to Detainee & Staff Sexual Misconduct Responding to Inmate Sexual Assault 3. Interviews: <ol style="list-style-type: none"> a. Chief of Corrections b. Agency Head c. Random Staff <p>115.62 (a) Pursuant to City of Atlanta Department of Corrections #400-13-02, When it is discovered that an inmate is in danger of being sexually abused, ACDC staff must act immediately to protect the inmate. Ways to protect inmates from sexual abuse include a) providing safe housing for the victim by separating the potential victim from the potential abuser. b) Restricting job assignments to minimize exposing the potential sexual assault victim to high-risk situations. c) If the potential abuser is a staff member, the department will take steps to keep the staff member and potential victim separate from one another during the period of investigation (i.e., reassigning the staff member to other duties or work area, suspending the staff member with pay during the investigation, temporarily banning the staff member from the building during the investigation). Per a review of the PAQ and interviews with random staff, all stated they would immediately remove the detainee from the area of threat and contact their next in line supervisor. Separation would be maintained. Per an interview with the Chief of Corrections and Agency Head, all detainees are single celled, they do not have work assignments, and do not gather in areas that does not provide direct staff supervision which reduces the occurrence of them being subject to a substantial risk of imminent sexual abuse. However, under any such circumstance, where a detainee is identified as an aggressor, that detainee would be placed in involuntary segregation. Separation would be maintained between the detainees, while continued monitoring would be performed by staff to include the housing unit officer during each shift on the detainee. If a staff member is identified, the staff member would be removed from the detainees' assigned area to include possible administrative leave and an investigation would be conducted by an OPA Investigator. There were zero detainees identified as at risk of being subject to a substantial risk of imminent sexual abuse during the 12-month review period.</p> <p>Based on the review of ACDC policy, observation during the site visit and interviews with the Chief of Corrections and Agency Head, it is determined ACDC meets the standard provision.</p>
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13-02, Responding to Detainee & Staff Sexual Misconduct Responding to Inmate Sexual Assault 3. Interviews: <ol style="list-style-type: none"> a. Chief of Corrections b. Agency Head <p>115.63 (a) (b) (c) (d) In accordance with ACDC #400-13-02, If there is an allegation that an inmate was abused at another facility, the allegation must be reported to the head of the other facility by the Chief of Corrections, within 72 hours of the allegation being received. All allegations received will be investigative by OPA. The Chief of Correction must ensure the other facility head is notified and such notification is documented. Per interviews with the Chief of Corrections and Agency Head, the facility has not received any notification of a detainee/inmate reporting an allegation of sexual abuse and/or sexual harassment having occurred while housed at ACDC. Additionally, there has not been any instances in which a detainee reported to ACDC staff an allegation of sexual abuse and/or sexual harassment having occurred at another correctional facility. The Chief of Corrections and Agency Head stated upon receiving notification from another facility of an allegation of sexual abuse and/or sexual harassment, he would contact the Office of Professional Authority (OPA) Commander and an investigation would be initiated. He added upon a detainee advising staff at ACDC of an allegation of sexual abuse and/or sexual harassment previously occurring at another facility, he would immediately contact the Department Head of that facility. The notification would be made verbally and documented in writing format.</p> <p>Based on the review the PAQ, and ACDC policy, interviews with the Agency Head and Chief of Corrections, it is determined ACDC meets all standard provisions.</p>

115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13-02, Responding to Detainee & Staff Sexual Misconduct Responding to Inmate Sexual Assault 3. PREA Investigative Casefile 4. Interviews: <ol style="list-style-type: none"> a. Random Staff <p>115.64 (a) (b) In accordance with ACDC #400-13-02, "staff first responder" is the first person to arrive after an incident of sexual abuse has occurred or the staff member who is first informed about an incident of sexual abuse. After an allegation of sexual abuse, it is vital to separate the victim and abuser, and to take steps to preserve evidence until an investigator arrives.</p> <p>Non-security staff duty includes instructing the inmate not to do anything that could destroy physical evidence (i.e., washing, brushing teeth, or rinsing mouth, changing clothing, urinating, or defecating, eating or drinking).</p> <p>Security staff member response duties include a). Separate the alleged victim and abuser. b) Secure the crime scene to protect any evidence until the evidence can be properly collected. c) If the abuse occurred within a time period that still allows for the collection of physical evidence, instruct the victim to not take any action that could destroy physical evidence washing, brushing teeth, or rinsing mouth, changing clothing, urinating or defecating, eating or drinking). d) If the abuse occurred within a time period that still allows for the collection of physical evidence, instruct the abuser to not take any action that could destroy physical evidence washing, brushing teeth, or rinsing mouth, changing clothing, urinating or defecating, eating or drinking. The abuser will be moved to a dry cell to prevent destruction of evidence.</p> <p>The ACDC PAQ identified that within the 12-month review period, one allegation that an inmate was sexually abuse was reported. This number was identified as incorrect per the review of the investigative case file, and interviews with the PREA Coordinator and OPA Investigator. The one reported PREA allegation was reported as a staff on inmate sexual harassment. The investigative findings were determined as unsubstantiated by the OPA Investigator. The detainee placed a Request Form in the medical box which was discovered days later alleging the staff member observed him urinating. The detainee and the staff member had previously been separated. Therefore, there were 0 reported allegations of sexual abuse and no instances in where physical evidence was required to be preserved and/or collected as evidence by security and/or non-security staff. No detainees were assigned at ACDC during the site visit who reported an allegation of sexual abuse to conduct interviews.</p> <p>Interviews conducted with random staff confirmed their knowledge in their responsibility to serve as a first responder to a detainees' report of sexual abuse. Staff identified they would immediately separate the detainees, contact their next in line supervisor, advise the victim not to dispose of any physical evidence such as brushing their teeth, washing their face, using the restroom, and change and preserve the area identified by the detainee as a crime scene.</p> <p>Based on the review of the ACDC PAQ and ACDC policy, interviews with random staff and review of one investigative casefile of sexual harassment, it is determined that ACDC meets all standard provisions.</p>

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 235">Auditor Discussion</p> <p data-bbox="242 271 812 295">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 329 1362 412" style="list-style-type: none"> <li data-bbox="242 329 1227 353">1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="242 387 1362 412">2. ACDC #400-13-02, Responding to Detainee & Staff Sexual Misconduct Responding to Inmate Sexual Assault <p data-bbox="242 445 1489 801">115.65 (a) The ACDC's coordinated response is outlined in ACDC #400-13-02. The policy states to coordinate the roles of different categories of personnel play when responding to an incident to sexual abuse, the department has developed a facility-based Sexual Assault Response Team (SART). The SART will be inclusive of, but not limited to the following members: The department's PREA Coordinator, designated mental health, staff first responders, designated medical staff, and OPA Investigator and a member of the command staff. The SART members will review all sexual abuse, sexual activity and staff sexual misconduct cases. Following the Department of Justice recommendations, the SART will coordinate the following actions: a) Assessing the victim's medical records. b) Informing the victim of his or her rights under relevant Federal or state law. c) Explaining the need for a forensic medical examination and offering the victim the option of undergoing one. d) Offering to have a victim advocate or a qualified staff member present during the exam. e) Providing crisis intervention counseling. f) Interviewing the victim and any witnesses. g) Collecting evidence. and h). Providing for any special needs the victim may have.</p> <p data-bbox="242 835 1430 893">Based on the review of the ACDC #400.13-02, that identifies the facility's coordinated response to an incident of sexual abuse, it is determined that ACDC does meet the provision of the standard.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1509 255">Auditor Discussion</p> <p data-bbox="229 255 1509 318">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="229 318 1509 537" style="list-style-type: none"> <li data-bbox="229 318 1509 358">1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="229 358 1509 398">2. Investigative Casefile <li data-bbox="229 398 1509 537">3. Interview: <ol data-bbox="229 492 1509 537" style="list-style-type: none"> <li data-bbox="229 492 1509 537">a. Agency Head <p data-bbox="229 537 1509 784">Per an interview with the ACDC Agency Head, the facility does not have an active collective bargaining agreement. The Chief of Corrections has full authority to reassign staff from contact with the detainee population and/or the placement of staff on administrative leave pending the outcome of an investigation. His decision to reassign a staff member and/or the placement of staff on administrative leave would be determined on the circumstances of the reported allegations. A review of the one reported staff on inmate sexual harassment allegation, confirmed the investigative report documented the staff member was immediately placed on "No contact status with the reporting detainee" throughout the release of the reporting detainee. The detainee was released from ACDC custody prior to the completion of the investigation.</p> <p data-bbox="229 784 1509 891">Based the interview with the agency head, review of the one reported PREA casefile and interview with the Agency Head, it is determined ACDC meets the provision of the standard.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.02, Responding to Detainee & Staff Sexual Misconduct: Responding to Inmate Sexual Assault 3. ACDC website Annual PREA Reports 3. Interviews: <ol style="list-style-type: none"> a. Designated Staff Member Charged with Monitoring Retaliation b. Chief of Corrections c. Head of Agency <p>115.67 (a) (b) (c) (d) (e) (f) Pursuant to ACDC #400-1302, Detainee/inmates and staff who report sexual abuse or harassment or who cooperate with investigations into incidents of sexual abuse and retaliation will be protected from retaliation from other inmates and staff members. Ways to protect inmates and staff from retaliation include: i) Making housing changes or transfers for inmate victims or abusers; b) Keeping alleged abusers (staff or inmates) away from alleged victims; ii) Keeping alleged abusers (staff or inmates) away from alleged witnesses and/or third-party reporters of abuse.</p> <p>The department will monitor the behavior and treatment of inmates and staff who have reported sexual abuse and inmates who were reported to have experienced sexual abuse. The Facility Commander or designee will monitor retaliation. Monitoring will last for at least 90 days and will focus on observing for changes that indicate possible retaliation by inmates and staff. The monitoring will continue after the initial 90 days period if it is found that ongoing monitoring is needed. The department will cease monitoring if it concludes that an allegation is unfounded. However, monitoring for unsubstantiated allegations will continue.</p> <p>There are various signs of retaliation. Staff who are monitoring for retaliation should observe /review such items as: 1) Inmate disciplinary reports; b) Housing or program changes; c) Negative performance reviews of reassignments of staff.</p> <p>For inmates, monitoring must include periodic status checks (e.g., asking the inmate if there are any changes in the way he or she is being treated to determine if they are being retaliated against).</p> <p>Department employee, volunteers, contracted employees, and agents will not retaliate against the compliant, the victim, the accused, witnesses or informants involved in the filing and intervention of sexual misconduct allegations. Forms of retaliation towards a detainee/inmate may include, but not limited to: unnecessary or excessive discipline, intimidation, unnecessary changes in work or program assignments, unwarranted placement in protective custody and unjustified denials of privileges or services.</p> <p>All allegations of staff sexual misconduct will be thoroughly investigated by the Office of Professional Accountability (OPA). OPA will notify boarding agencies of any sexual misconduct pertaining to their perspective detainees. Appropriate corrective or disciplinary action up to, including, dismissal will be taken whenever this policy is violated. The severity and extent of discipline will be determined on a case-by-case basis by the totality of factors and circumstances of the individual situation.</p> <p>Per an interview with the agency head, retaliation in any manner is not tolerated. Anyone who is identified as performing acts of retaliation will receive discipline up to termination. Staff will be safeguarded from acts of retaliation and will be given the opportunity to be reassigned. Supervisors will be advised to monitor for any occurrences of retaliation to include via radio traffic, video monitoring. All reports of retaliation would be reviewed and investigated and handled accordingly immediately. Regarding the detainee population, they also have the right to be protected from retaliation. Staff responsible for supervising the detainee would be made aware to monitor the detainee while giving the detainee a voice to express any concerns they may have. The zero-tolerance policy would be enforced to provide a safety net for the detainee.</p> <p>Per an interview with the Chief of Corrections, ACDC has a zero tolerance for retaliation on staff and the detainee population. The detainee and staff member would be advised of the available resources to provide a safety net from retaliation. In instances for staff, they would be monitored for any unusual circumstances with the individual being monitored. Such as a change in staff interaction with others, outside normal absences from work, unexplainable changes in shift and post assignments, denial of requested leave, and disciplinary write-ups. The ACDC has a Whistle blower policy that allows staff to report any violations that offer protection. He continued in stating, regarding the detainee population, the review of the detainee's assignment changes, unjustifiable denial of access items, unjustifiable write ups, decreased in interaction with</p>

staff and other detainees. An investigation would be conducted by the OPA and actions to follow on those identified to perform retaliation would be addressed and held accountable.

An interview was conducted with staff assigned to conduct retaliation monitoring. She indicated, upon a staff member and/or detainee reporting an allegation of sexual harassment, sexual abuse, and/or cooperating with the report of such, they would be monitored for any form of retaliation by staff and/or detainee for any unusual and/or unjustifiable changes to normal activities. Once an allegation is made by a detainee from a staff member, the staff member is placed on no contact with the identified detainee throughout the investigation, and /or released from ACDC custody. She would make an initial contact with the detainee, and he/she would be monitored until their release from ACDC custody prior to 90 days, every 30 days for a period of 90 days and or longer if there were some concerns identified.

She would also make the initial contact with a staff member who is identified to be monitored for retaliation. She stated as a supervisor she conducts rounds often and would interact with the staff member more often than during 30-day intervals. However, she would document the 30-, 60- and 90-day meetings with the staff member. The retaliation monitoring will exceed 90-days if it is determined there are some concerns as there is not a maximum time period for monitoring staff's safety. Staff would be encouraged to report any concerns of unusual occurrences with shift changes, write-ups, negative interactions with others and denial of leave. An investigation would be initiated by the OPA for the review of possible violations by others.

Per interview with the Chief of Corrections and the staff member assigned to conduct retaliation monitoring, review of annual PREA reports on the agency's website, and the one investigative casefile, there were no reported allegations of sexual abuse during the review period. Additionally, there were zero reported allegations of sexual abuse since 2019. Due to the Atlanta City of Counsel voted in 2018 to allow most of the prisoners brought to ACDC (who are arrested on city ordinance violations, not more serious state criminal charges) to be released without having to post a cash bail, detainees are released within 24 – 48 hours. There were no detainees who reported allegations of sexual abuse and/or in segregated housing for risk of sexual victimization/who allege to have suffered sexual abuse at ACDC for interviews during site visit.

Therefore, based on ACDC policy, review of the ACDC Annual PREA Reports, review of the one reported PREA investigative case file, and interviews with the Chief of Corrections, Agency Head and staff assigned to conduct retaliation monitoring understanding and identified procedures in monitoring and addressing retaliation monitoring, ACDC does meet all standard provisions.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13-02, Responding to Detainee & Staff Sexual Misconduct Responding to Inmate Sexual Assault 3. Interviews: <ol style="list-style-type: none"> a. Chief of Corrections b. Staff Who Supervise Segregation <p>115.68 (a) In accordance with ACDC #400-13-02, If an inmate who is alleged to have experienced sexual abuse is placed in a segregated housing for protection, staff must follow the requirements for protective custody listed: a) Placement in involuntary segregated housing (protective custody) can be done only when no other way to separate the victim from the abuser(s) exists. b) Inmates in segregated housing must have as much access as possible to programs, privileges, education and work opportunities. c) Inmates requesting voluntary segregated housing must be checked every 30 days to determine if the inmate needs to be kept separate from the general population. Victims shall not be held for longer than five (5) days in any type of administrative segregation, except in highly unusual circumstances or at the request of the victim.</p> <p>Per the ACDC PAQ and interviews with the Chief of Corrections and staff assigned to supervise segregation, there were zero detainees who reported an allegation of sexual abuse at the facility during the 12-month review period. Therefore, none were placed in involuntary segregation</p> <p>Per an interview with the Chief of Corrections, all detainees are assigned single cells at ACDC and are directly supervised by staff. The facility does not place detainees who alleged sexual abuse in involuntary segregation. None were placed in involuntary segregation during the 12-month review period. The facility has numerous housing units that would be utilized to ensure separation of a victim and an aggressor without the placement of an alleged victim in restricted housing (special management unit).</p> <p>An interview with staff assigned to supervise segregation stated, detainees who report allegation of sexual abuse are not and would not be placed involuntary segregation. The alleged aggressor will be separated from the alleged victim pending the completion of the investigation or release from ACDC and further actions would depend on the investigative findings. The facility has various housing units that would allow separation without assigning the alleged victim to involuntary segregation (special management housing unit). However, the detainee may request to be placed in the special management unit for protection. He added due to the detainees' ability to do a no cash self-bond, detainees typically do not remain at the facility in an excess of a week. However, all available privileges to include phone access, recreation, mail, and visitation would be awarded to them during their stay at ACDC.</p> <p>There were no detainees identified as reporting an allegation of sexual abuse and/or placed in involuntary segregation during the site visit to conduct an interview.</p> <p>Based on the review of ACDC policy, interviews with the Chief of Corrections and supervisor assigned to supervise segregation, observation during the site visit, it is determined that ACDC does meet the provision of the standard.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 812 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 329 1246 815" style="list-style-type: none"> 1. Atlanta City Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.05 Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations 3. ACDC #400-13.03, Responding to Detainee & Staff Sexual Misconduct: Training & Education 4. ACDC Completed PREA Investigations 5. Interviews: <ol data-bbox="240 616 770 815" style="list-style-type: none"> a. Office of Professional Authority (OPA) Investigator b. ACDC Chief of Corrections c. ACDC PREA Coordinator d. ACDC PREA Compliance Manager <p data-bbox="240 846 1493 1072">115.71 (a) In accordance with ACDC #400-13.05, The Facility /Housing Commander and/or Office of Professional Accountability (OPA) is responsible for ensuring a thorough and objective investigation of the incident is completed. The Watch Commanders or designee are responsible for ensuring a thorough and investigation of the PREA incidents, occurring within the facility is forwarded to the OPA for investigation. The Watch Commanders or designee shall ensure the incident reports are detailed, completed, reviewed and submitted prior to the end of the tour of duty following any PREA incident and email a brief statement of the incident to the SART Team members and Accreditation Manager. A full report will be forward to the Facility Commander and Accreditation Manager.</p> <p data-bbox="240 1104 1493 1232">Watch Commanders or designees are required to consult with the OPA prior to notifying the Atlanta Police Department (APD) Special Crime Victim Unit of any allegations of sexual abuse that appear to be criminal in nature. The investigations of detainee/inmate sexual abuse and sexual harassment are required to be conducted by the OPA, promptly, thoroughly, and objectively, including those reported by third-party and anonymously.</p> <p data-bbox="240 1263 1493 1420">Allegations of sexual abuse and sexual harassment, including third-party and anonymous allegations will receive a prompt, thorough and objective investigation. When outside agencies investigate sexual abuse (i.e., in cases referred for criminal investigation), the department will cooperate with outside investigators and will make all efforts to remain informed about the progress of the investigation. All referrals of allegations of sexual abuse or sexual harassment for criminal investigation will be documented.</p> <p data-bbox="240 1451 1493 1713">Per an interview with the OPA Investigator, she explained, an investigation into an allegation of sexual harassment and/or sexual abuse would be initiated upon receipt of notification of the allegation. She identified the first steps taken in the investigation would include reporting to the identified area, ensure separation of the alleged victim and aggressor, conduct interviews with the alleged victim, alleged aggressor and any identified witnesses and others within the affected area, collect and preserve all available evidence, review available video, ensure both detainees are seen by medical, and the victim is seen by mental health and review the history of both. A thorough and complete investigation would be conducted by her office and/or the Atlanta Police Department (APD) based on the allegations made. Her department would provide assistance to the APD as needed throughout the investigation and remain informed of the ongoing investigation status.</p> <p data-bbox="240 1744 1493 2107">115.71 (b) Pursuant to ACDC #400-13.03, In addition to the general training required for all employees, ACDC Investigator will receive specialized training pertaining to conducting investigations in confinement settings. Per an interview with an OPA Investigator, she confirmed all investigators within the department have completed the specialized training that allows them to conduct sexual abuse and sexual harassment investigations for the agency. The training includes techniques for interviewing, use of the Garrity and Miranda warnings, the collection and preservation of physical evidence, and the criteria and evidence to determine an investigative finding. A review of the one reported PREA allegation, confirmed the investigation was conducted by an OPA Investigator, who has completed the required training of PREA: Conducting Sexual Abuse Investigations in a Confinement Setting and the PREA: Conducting Sexual Abuse Investigations in a Confinement Setting – Advance. Both courses were presented by the National Correctional Institute as identified in standard 115.34. The Atlanta Police Department Special Crime Victims Unit is identified as the agency to conduct sexual abuse investigations for the agency.</p> <p data-bbox="240 2139 1361 2166">115.71 (c) (d) In accordance with ACDC #400-13.05, Investigator are required to gather and preserve direct and</p>

circumstantial evidence as appropriate, including any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. The auditor conducted a review of the one reported PREA allegation during the 12-month review period. The investigative report included an abundance of documentation that supports a thorough investigation. Specifically, the investigative case file included written and verbal statements of the alleged victim and alleged aggressor, written and verbal statements of staff involving in the reporting process of the allegation, summary of detainee's mental health and medical services upon reporting, video surveillance, finding of facts documenting a thorough timeline of the investigation that included the date and times of occurrences, reference ACDC policies, and final disposition based on the evidence collected. The allegation did not include the acts that included the requirement of physical and/or DNA evidence collection.

115.17 (d) In accordance with ACDC #400-13.05, Watch Commander or designees shall consult with OPA prior to notifying the Atlanta Police Department (APD) Special Victim Unit of any allegations of sexual abuse occurring within the ADOC that appear to be criminal in nature. Allegations of sexual abuse or sexual harassment occurring with the ADOC that appear to be criminal in nature will be referred to the APD Special Victims Unit for criminal investigation. When the quality of evidence appears to support criminal prosecution, APD Special Victims Unit will conduct all interviews only after consulting with prosecutors as to any obstacle for subsequent criminal prosecution. Per the PAQ and review of the one reported PREA allegation casefile and interviews with the OPA Investigator, there were zero reported allegations of sexual abuse and/or sexual harassment reported that appeared to be criminal in nature during the 12-month review period.

115.71 (e) Pursuant to ACDC #400-13.05, the credibility of an alleged victim, suspect, or witness will be assessed on an individual basis and not determined by the person's status as inmate or staff. The department does not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. The one reported PREA allegation alleged the allegation of sexual harassment, not sexual abuse. However, the review of one reported staff on inmate sexual harassment allegation investigative findings, confirmed the investigative findings was based on the evidence collected not on status of the individuals involved. The alleged detainee victim of sexual harassment was released from the ACDO custody on December 16, 2021, and was therefore, unavailable for an interview by the auditor. There were no reported allegations of sexual abuse during the review period.

115.71 (f) In accordance with ACDC #400-13.05, Administrative investigations are to be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. The investigations will include an effort to determine whether staff actions or failures to act contributed to the abuse. There were no reported allegations of sexual abuse during the review period. The alleged victim of sexual harassment did not identify any witnesses to his allegation; therefore, none was identified for interview. The sexual harassment investigative report was a thoroughly written report of the testimonial evidence by those involved in the reporting process and who had conversation and interaction between the alleged victim and both medical and mental health staff. The administrative investigative report did not identify staff's actions and/or failure to act contributed to the allegation of sexual harassment.

115.17 (g) In accordance with ACDC #400-13.05, Allegations of sexual abuse and sexual harassment occurring with the ADOC that appear to a criminal in nature will be referred to the Atlanta Police Department (APD) Special Crime Victims Unit for criminal investigation. Per the ACDC PAQ and review of the investigative report of sexual harassment, in addition to interviews with the OPA Investigator, there were no reported sexual abuse and/or sexual harassment allegations reported that identified possible criminal charges. Per the OPA Investigator, both criminal and administrative investigations would contain a thorough description of physical, testimonial, and documentary evidence and contain attachments of documentary evidence collected and reviewed throughout the investigation. The review of the administrative investigation of sexual harassment confirmed the manner of documentation and evidence identified, organized, and collected in the administrative investigation utilized during a criminal investigation would be sufficient to support criminal charges upon being reported.

115.71 (h) Pursuant to ACDC #400-13.05, Substantiated allegations of conduct that appear to be criminal are referred for prosecution. There were no reported allegations of sexual abuse during the review period. The reported allegation of staff on inmate sexual harassment was determined as unsubstantiated.

115.71 (i) In accordance with ACDC #400-13.05, The department will retain all written reports related to administrative investigation and criminal investigation for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. Per an interview with the OPA Investigator, ACDC retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. The auditor was presented with investigation case files conducted in 2016 and 2018 for review.

115.17 (j) (k) Pursuant to ACDC #400-13.05, The departure of the alleged abuser or victim from the employment or control of the department will not provide a basis for termination than investigation. Per an interview with the OPA Investigation, all investigations to include PREA would continue to include upon the departure of the alleged victim and/or aggressor to include investigation completed by the OPA and the Atlanta Police Department. A review of the one staff on inmate sexual harassment investigation confirmed the alleged victim was released from the ACDC custody on December 16, 2021, and the

investigative findings were concluded on January 26, 2022.

115.17 (i) In accordance with ACDC #400-13.05, When outside agencies investigate sexual abuse (i.e., in cases referred for criminal investigation), the department will cooperate with outside investigators and will make all efforts to remain informed about the progress of the investigation. Per interviews with the Chief of Corrections, ACDC PCM and ADOC PREA Coordinator, and the OPA Investigator the Atlanta Police Department Special Crime Victims Unit conducts all investigations that could result in criminal charges. Communication of the investigation process is maintained between the OPA Investigator and the APD.

Based on the review of ACDC policies, interviews with staff, review of the investigative case file, ACDC meets all provisions of the standard.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 813 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 329 1246 414" style="list-style-type: none"> <li data-bbox="242 329 1171 356">1. Atlanta City Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="242 385 1246 412">2. ACDC #400-13.05 Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations <p data-bbox="242 443 1485 638">115.72 In accordance with ACDC #400-13.05, The department imposes a standard of a preponderance of evidence when determining whether allegations so sexual abuse or harassment are substantiated. An interview with the ACDC investigator indicated all investigative findings are based on the preponderance of evidence completed only. The review of the completed investigative casefile completed by the OPA Investigator, confirmed findings were based on the evidence collected in the preponderance of evidence supported the allegation of sexual harassment could not determine whether or not the act occurred. Therefore, the investigative finding was determined as Unsubstantiated.</p> <p data-bbox="242 669 1445 728">Based on the review of agency policy, documentation contained in the investigative case file, and interview with the OPA Investigator, it is determined ACDC does meet the standard provision.</p>

115.73	Reporting to inmates
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 329 1362 640" style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.02 Responding to Detainee & Staff Sexual Misconduct: Responding to Inmate Sexual Assault 3. ACDC #400-13.05, Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations 4. Interviews: <ol style="list-style-type: none"> a. ACDC Office of Professional Authority (OPA) Investigator b. ACDC Chief of Corrections <p data-bbox="242 672 1465 869">115.73 (a) In accordance with ACDC #400-13.02, Any inmate who makes an allegation that he or she has suffered sexual abuse will be informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the department. Pursuant to ACDC #400-13.05, It is the responsibility of the Office of Professional Authority (OPA) to notify all alleged victims of the outcome of their respective complaint in writing. The OPA Unit will also advise alleged victims of any criminal indictments of department personnel and the entity prosecuting the accused.</p> <p data-bbox="242 898 1493 1059">Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the OPA shall inform the inmate (unless the allegation is unfounded) whenever: a) The staff member is no longer posted within the inmate's unit. b) The staff member is no longer employed at the facility" c) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility. d) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</p> <p data-bbox="242 1088 1485 1350">Per the PAQ, review of the investigative case file and interviews with the ACDC PREA Coordinator and OPA Investigative, there was only one PREA allegation reported during the review period. Specially one detainee reported the allegation of staff on inmate sexual harassment. The investigation was determined as Unsubstantiated. Per interviews with the Chief of Corrections and the OPA Investigator, the OPA department is responsible for notifying all detainees of the investigative findings to include investigations conducted by the Atlanta Police Department. Documentation was provided in support that the detainee who alleged staff sexual harassment was notified of the investigative finding. The detainee was previously released from ACDC custody prior to the completion of the investigation. However, a letter identifying the investigative findings of his allegation as unsubstantiated was forwarded to the detainee's release address via certified mail.</p> <p data-bbox="242 1379 1485 1473">Based on the review of ACDC policies, the investigative case file, notification of investigative findings forward to the released detailed via certified mail, documentation of certified mail, and interviews with the OPA Investigator and Chief of Corrections, ACDC meets the provision of the standard.</p>

115.76	Disciplinary sanctions for staff
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 329 1254 472" style="list-style-type: none"> <li data-bbox="242 329 1177 358">1. Atlanta City Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="242 385 1254 414">2. ACDC #400-13.05, Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations <li data-bbox="242 441 895 470">3. ACDC #700-04, Administration and Management, Harassment <p data-bbox="242 501 1484 629">115.76 (a) (b) (c) Pursuant to AODC # 700-04, The ACDC has established a standard of zero tolerance for sexual abuse, sexual activity, sexual harassment and staff sexual misconduct. Harassment of any type, whether verbal, physical or environmental, will not be tolerated in the workplace and appropriate corrective or disciplinary action will be imposed against culpable employees.</p> <p data-bbox="242 658 1485 954">Per ACDC #400.13.02, Violation of departmental policies on sexual abuse and sexual harassment will result in sanctions, up to and including dismissal from employment and referral for criminal prosecution. Dismissal from employment will be the presumptive sanctions for staff engaging sexual abuse. Disciplinary sanction for violations of department policy related to sexual abuse or sexual harassment (other than engaging sexual abuse) will be commensurate with the nature and circumstances of the acts committed, the staff's member disciplinary history, and the sanction imposed for compared offenses by other staff with similar histories. All terminations for violation of the Departmental sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation will be reported to law enforcement agencies, unless the activity was clearly not criminal. These acts will also be reported to the Georgia Peace Officers Standards and Training Council (POST).</p> <p data-bbox="242 983 1484 1346">In accordance with ACDC #400.13-.05, A detainee/inmate complaint of harassment and /or sexual harassment by a staff member will be promptly forwarded to the OPA for investigation. OPA will notify the affected Division Head to take steps to restrict the accused employee from any contact with the detainee/inmate complainant. The Facility/Housing Commander will also be notified of the complaint. All allegations of staff sexual misconduct will be thoroughly investigated by Office of Professional Accountability (OPA). OPA will notify the boarding agencies of any sexual misconduct pertaining to their respective detainees/inmates. Appropriate corrective or disciplinary action up to and including dismissal will be taken whenever the policy is violated. The severity and extent of discipline will be determined on a case-by-case basis by the totality of factors and circumstances of the individual situation. Alleged violations of state statutes will be referred to the appropriate law enforcement agency when necessary. Allegations of sexual abuse or sexual harassment occurring with the Department of Corrections that appears to be criminal in nature will be referred to the Atlanta Police Department (APD) Special Crime Victims Unit for criminal investigation.</p> <p data-bbox="242 1375 1484 1606">There were no Substantiated allegations of staff on inmate sexual abuse and/or sexual harassment during the 12-month review period. The most recent Substantiated staff related PREA investigation was concluded dated May 18, 2016, for staff on inmate sexual abuse (touching inappropriately). The staff member was terminated and arrested and charged with Sexual Battery. However, one staff on inmate sexual harassment allegation was reported during the 12-month review period. The staff member was placed on no-contact status with the alleged victim throughout the inmate's remaining 13 days at the facility. The investigation continued after the inmate's departure from ACDC, with an investigative finding of Unsubstantiated by the OPA Investigator. No disciplinary actions were imposed.</p> <p data-bbox="242 1635 1484 1727">Based on the ACDC PAQ, ACDC policies, interviews with the OPA Investigator and ACDC PREA Coordinator, and review of the only reported PREA allegation of staff on inmate sexual harassment with an investigative finding of Unsubstantiated, ACDC meets all provisions of the standard.</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Atlanta City Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.05, Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations 3. ACDC #400-13, Responding to Detainee & Staff Sexual; Misconduct: Introduction, Definitions & Responsibilities 4. Interviews: <ol style="list-style-type: none"> a. ACDC Chief of Corrections b. ACDC Religious Services Chaplain/Program Services Manager <p>115.77 (a) (b) Pursuant to ACDC #400-13, It is the responsibility of all volunteers, contractors, or agents to promptly report sexual abuse, sexual activity or staff sexual misconduct. Failure to do so may result in corrective action up to, and including, termination of services or cancellation of contract.</p> <p>In accordance with #400-13.5, Any contractor or volunteer who engages in sexual abuse will be prohibited from contract with inmates and will be reported to law enforcement agencies, unless the activity is clearly not criminal, and reported to relevant licensing bodies. The facility will take appropriate remedial measures and will consider whether to prohibit further contact with inmates, in the case of any other violation of department sexual abuse or sexual harassment policies by a contractor or volunteers.</p> <p>There were no instances of a Substantiated investigative finding of sexual abuse and/or sexual harassment during the review period to include the involvement of contract workers. The most recent substantiated case of sexual abuse was reported to have occurred on May 17, 2016, that involved touching only, this case did not involve contract staff.</p> <p>Per an interview with the Chief of Corrections, he stated, the facility does not have volunteers who enter the facility. This statement was also confirmed by the ACDC Religious Service Chaplain/Program Services Manager. The Chief of Corrections further stated all contractors would be held accountable just as agency employees. They would immediately be removed from the agency's property, their position and assigned responsibilities as such. No further interaction would be allowed between the contract worker and detainee(s). The contract staff member would be placed on leave throughout the investigation, and further actions would be determined based on the investigative finding to include referred for prosecution and reporting to relevant licensing bodies as applicable. Volunteers would also be subjected to the same circumstances as contract workers.</p> <p>Based on the ACDC PAQ, ACDC policies, review of the one PREA investigative case file during the 12-month review and interviews with the Chief of Corrections, ACDC does meet all provisions of the standard.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Atlanta City Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.05, Responding to Detainee & Staff Sexual Misconduct: Reporting & Investigations 3. Interviews: <ol style="list-style-type: none"> a. Chief of Security b. Mental Health Administrator c. ACDC PrEA Coordinator d. ACDC OPA Investigator <p>115.78 (a) In accordance with ACDC #400-13.5, Inmates will be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or a criminal finding of guilt for inmate-on-inmate sexual abuse. Sanctions will be imposed in accordance with departmental policies. Per the PAQ, interviews with the PREA Coordinator, and ACDC investigative, in the past 12-month of the review, there were no reported administrative and /or criminal reported allegations of sexual abuse to include inmate on inmate sexual abuse.</p> <p>115.78 (b) (c) In accordance with ACDC #400-13.5, Sanctions will be commensurate with the nature and circumstances of the abuse committed, the inmate disciplinary history, and the sanction imposed for comparable offenses by other inmates with similar histories. The disciplinary process will consider whether the inmate's mental disabilities or mental illness contributed to behavior when determining what type of sanctions, if any, will be imposed. Per the PAQ and an interview with the Chief of Corrections, an investigation would be conducted on allegations of sexual abuse committed by all inmates alleged to commit such acts. Criminal charges would be the result of Substantiated allegation of sexual abuse upon the completion the investigation by the Atlanta Police Department Special Crime Victims Unit. The detainee would be subject to sanctions issued by the courts, as if a detainee was charged with criminal charges, he/she would no longer be housed at ACDC. ACDC only houses detainees for minor misdemeanors who are eligible for no cash self-bond release.</p> <p>115.78 (d) In accordance with ACDC #400.13.5, The department will determine if the inmate-abuser could benefit from therapy, counseling or other interventions to address and correct underlying reasons or motivation for the abuse. An interview with mental health staff indicated crisis interaction and supportive counseling are offered. Services are also available with a psychiatrist. If the detainee is scheduled to depart the facility soon, they are given information to contact the Grady Crisis Center for additional services that are available for a year.</p> <p>115.78 (e) In accordance with ACDC #400.13.5, An inmate may be disciplined for sexual contract with a staff member only upon a finding that the staff member did not consent to such contact. There were no reported allegations of sexual abuse during the review period that involved staff and/or detainees. Therefore, no discipline was applied.</p> <p>115.78 (f) Pursuant to ACDC #400-13.5, For the purposes of a disciplinary action, a report of sexual abuse made in good faith upon a reasonable belief that the alleged conduct occurred will not constitute falsely reporting an incident or lying, even if an investigation does not establish sufficient evidence to substantiate the allegation. If it is found that an allegation of rape, sexual assault, sexual activity of staff sexual misconduct was false, the case will be referred to law enforcement for prosecution. Any detainee/inmate who files a false allegation will also receive an Inmate Disciplinary Report (IDR) to include a request of restitution when applicable. There were no reported PREA allegations that identified a detainee as an aggressor during the review period.</p> <p>115.78 (g) In accordance with ACDC #400.13.5, The department prohibits all consensual sexual activity between inmates, and inmates may be subject to disciplinary actions for such activity. Consensual (non-coerced) sexual activity between inmates does not constitute sexual abuse but is considered a disciplinary issue.</p> <p>There was no inmate on inmate reported sexual abuse cases, and no reported allegations of staff on inmate sexual abuse allegation during the 12-month review period. The auditor reviewed older PREA investigations that occurred in 2016 and 2018, and none alleged allegations against a detainee. Thus, there were no investigations and/or possible discipline action to review pursuant to this standard. Therefore, based on the review of ACDC policies and interviews with the Chief of Corrections and mental health staff, ACDC does meet all provisions of the standard.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Correctional (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.04, Responding to Detainee & Staff Sexual Misconduct: Screening 3. Review of Mental Health Screening Logs 4. Interviews: <ol style="list-style-type: none"> a. Mental Health Administrator b. Staff who conduct Risk Screening c. ACDC Medical Doctor <p>115.81 (a) (c) In accordance with ACDC #400-13.04, All detainees will be screen within eight (8) hours of admittance to the facility for potential vulnerabilities or tendencies of acting out with sexual aggressive behavior during the intake medical screening.</p> <p>Detainee/inmate identified as high risk with a history of sexually assaultive behavior will be assess by a mental health or other qualified professional. Detainees/inmates identified as at risk of sexual victimization will be assess by a mental health or other qualified professional All detainees/inmates who have disclosed any prior sexual victimization during a screening are offered a follow-up meeting with a medical or mental health practitioner.</p> <p>115.81(b) ACDC is a jail and not a prison. This provision is not applicable.</p> <p>115.81 (c) A roster identifying detainees/inmates who reported prior victimization and/or abusiveness during intake was presented by the mental health administrator. Three-hundred and seventy detainees reported being prior victims of sexual abuse and 11 were identified as prior aggressors. Per an interview with staff assigned to conduct risk screening, newly arriving detainees are seen by mental health normally not later than the following day of their arrival, but always not later than 48 hours. Per an interview with the mental health administrator, notification of the referral is forward to her by staff conducting the risk screening advising her of arriving detainees who reported being a prior victim and/or a prior aggressor. She continued in stating the identified detainees are seen within 48 hours, but also all newly arriving detainees who remain for 48 hours or longer are seen within the time frame (48 hours). Her department is required to see all detainees within 48 hours of their arrival. Mental health staff are scheduled to work Monday – Friday from 9:00 a.m. – 10:00 p.m. and are also scheduled for on-call to report as needed.</p> <p>115.81 (d) Per interviews with staff who conducts risk screening, medical and mental health staff, information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to staff within a need-to-know basis to provide a safe environment and proper medical and mental health treatment.</p> <p>115.81 (e) Per interviews with both medical and mental health practitioners they stated they obtain informed consent from the detainees before reporting information about prior sexual victimization that did not occur in an institutional setting unless the inmate is under the age of 18. However, regardless of the detainee’s authorization, they are mandated to reported and are required to report allegations of sexual abuse to the local law enforcement agencies as it would be identified as a crime. The detainee is advised of their mandate to report prior to the initiation of services. Both medical and mental health staff stated they have not been informed of any instances in where a detainee reported an allegation of sexual abuse occurring at the facility and/or outside the facility that was not previously reported.</p> <p>Based on the review of ACDC policy, review of tracking log for detainees identified as prior victims and aggressors and confirmation of date seen by mental health, and interviews with staff who conduct risk screenings, medical and mental health, ACDC does meet all required provisions of the standard as a jail facility.</p>

115.82	Access to emergency medical and mental health services
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 329 1366 645" style="list-style-type: none"> <li data-bbox="242 329 1201 358">1 City of Atlanta Department of Correctional (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="242 387 1366 416">2 ACDC #400-13.04, Responding to Detainee & Staff Sexual Misconduct: Responding to Inmate Sexual Assault <li data-bbox="242 445 376 474">3. Interviews: <ol data-bbox="242 504 624 645" style="list-style-type: none"> <li data-bbox="242 504 496 533">a. ACDC Medical Doctor <li data-bbox="242 562 624 591">b. ACDC Mental Health Administrator <li data-bbox="242 620 515 649">c. ACDC OPA Investigator <p data-bbox="242 674 1481 835">115.82 (a) (b) In accordance with ACDC #400-13.02, Victims of sexual assault will receive prompt medical attention, Victims are referred under appropriate security provisions to a community facility for treatment and gathering of evidence at Grady Hospital. Medical care and sexual abuse examination are separate and different procedures. Detainees/inmates have the right to refuse either. Victims should be encouraged, but not forced to consent to a sexual abuse examination. However, detainees can refuse consent to sexual abuse examination and still consent to and receive medical cares.</p> <p data-bbox="242 864 1458 960">There were no reported allegations of sexual abuse at ACDC during the 12-month review period and no detainees to interview. Per an interview with the OPA Investigator, during her 10-year tenure as an investigator at ACDC, there has not been a reported allegation of sexual abuse that involved penetration.</p> <p data-bbox="242 990 1485 1151">Per interviews with both medical and mental health staff, detainees who allege allegations of sexual abuse would receive immediate medical care and mental health service. Medical staff are on duty 24/7 and mental staff are on call outside their scheduled work hours, Monday - Friday 9:00 a.m. - 10:00 p.m. Both identified the nature and scope of services that would be offered to a victim of sexual abuse is in accordance with their professional judgement, agency policies, licensing board, federal and state laws.</p> <p data-bbox="242 1180 1485 1276">Sexual abuse examinations will be conducted at Grady Hospital in the area designated by the hospital for such examinations to occur. Victims will have access to free forensic medical examination and the department will make attempt to ensure the examinations are conducted by a Sexual Assault Nurse Examined (SANE).</p> <p data-bbox="242 1305 1458 1402">Grady Hospital will make available a victim advocate from the Grady Rape Crisis Center. At the victim's request, the victim advocate can accompany the victim during the forensic medical examination and investigative interviews. The victim advocate will offer emotional support, crisis intervention, information, and referrals.</p> <p data-bbox="242 1431 1481 1659">115.82(c) Pursuant to ACDC #400-13.02, Provision will be made for testing for sexually transmitted diseases (for example HIV, gonorrhea, hepatitis, and other diseases) and counseling as appropriate. Prophylactic treatment and follow up for sexually transmitted disease will be offered to all victims, as appropriate, Victims will also receive information about emergency contraception. Per an interview with the ACDC medical and mental health staff, all tests would be completed at the Grady Hospital. ACDC will conduct continuous follow-up to include medication as needed, labs, to include returning the victim to Grady Hospital for any identified treatment that cannot be provided at ACDC. There were no reported allegations of sexual abuse at the facility during the 12-month review nor during the site visit.</p> <p data-bbox="242 1688 1490 1785">115.82 (d) Sexual abuse examinations will be conducted at Grady Hospital in the area designated by the hospital for such examinations to occur. Victims will have access to free forensic medical examination and the department will make attempt to ensure the examinations are conducted by a Sexual Assault Nurse Examined (SANE).</p> <p data-bbox="242 1814 1469 1910">Based the review of ACDC policy, no reported allegations of sexual abuse casefiles that included the allegation of penetration in over 10 years, and interviews with medical and mental health supervisors, ACDC does meet all provisions of the standard.</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Correctional (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13.04, Responding to Detainee & Staff Sexual Misconduct: Responding to Inmate Sexual Assault 3. Interviews: <ol style="list-style-type: none"> a. ACDC Medical Doctor b. ACDC Mental Health Administrator c. ACDC OPA Investigator <p>115.83 (a) (b) (c) (d) (e) (f) (g) In accordance with ACDC#400.-13.04, If needed, non -emergency medical and mental health will be offered to all inmates who are victims of sexual abuse in any confinement setting. The care and treatment can be extended to inmates who are abused while in the custody of the department or in another facility. Evaluation and treatment must include, as appropriate: follow-up services, treatment plans and referrals for continued care in another facility or after inmates have been released from custody. Any health care services will be equivalent to the community level of care.</p> <p>Pregnancy test and all lawful medical services related to pregnancy care will be offered inmates who have been sexually abused during incarceration on a voluntary basis. Services will be offered at no charge to detainees/inmates and will not be required to name the abuse to cooperate with an investigation to receive treatment.</p> <p>Per interviews with both medical and mental health staff, follow-up after the release of a detainee would be provided by the Grady Rape Crisis Center. Continued care would include crisis counseling, medication as needed, follow-up testing and identified services by other medical and mental health practitioners. An identified aggressor would be offered an evaluation if the incident was recent. There were no reported allegations that involved sexual penetration with the past 10 years per an interview with an ACDC OPPA Investigator. Both confirmed the victim would not be held financially responsible for any treatment services. They each identified the level of care provided to the ACDC detainees are consistent if not better than those services provided within the local community.</p> <p>115.83 (h) ACDC is a jail not a prison. This provision is not applicable.</p> <p>Based on the review of ACDC policy, interviews with both medical and mental health supervisors, and the ACDC OPA Investigator, it is determined ACDC does meet all provisions of the standard.</p>

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 812 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 331 1417 645" style="list-style-type: none"> <li data-bbox="240 331 1225 358">1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="240 387 1417 414">2. ACDC #400-13, Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities <li data-bbox="240 443 408 470">3. Interviews: <ol data-bbox="240 504 927 645" style="list-style-type: none"> <li data-bbox="240 504 469 530">a. Chief of Corrections <li data-bbox="240 560 927 586">b. Member of the Incident Review Team, (ACDC PREA Coordinator) <li data-bbox="240 616 620 642">c. ACDC PREA Compliance Manager <p data-bbox="240 674 1493 936">Pursuant to ACDC #400-13, OPA will conduct a sexual abuse incident review within 30 days after the conclusion of every sexual abuse investigation, whether substantiated or unsubstantiated. Reviews are not necessary for unfounded allegations. There were zero reported sexual abuse allegations reported during the 12-month review period. However, the facility conducted an incident review for unsubstantiated sexual harassment investigative finding. The investigation was documented as concluded on January 26, 2022, and the incident review was conducted on April 7, 2022. Although the incident review was conducted outside the standard provision, the agency' policy nor does the standard provision require the completion of an incident review to be conducted within 30 days of an unsubstantiated allegation of sexual harassment. Therefore, ACDC cannot be determined as it does not meet the provision of the standard.</p> <p data-bbox="240 965 1481 1193">However, the auditor recommended the review of ACDC policy #400-13, and the PREA standard by the Sexual Assault Response Team (SART) team for a clear understanding in the completion of incident reviews. Specifically, the auditor requested a signature copy of the SART members acknowledgment of training outlining the ACDC policy that coincides with the standard provision in completing incident reviews within 30 days of all substantiated and unsubstantiated sexual abuse investigative findings. Additionally, the auditor determined it would not be feasible to place the facility in a corrective action period as the completed incident review was not a requirement per the standard provision and due to the rarity of sexual abuse allegations being reported. The most recent sexual abuse allegation was reported in 2016.</p> <p data-bbox="240 1223 1485 1485">115.86 (c)Pursuant to ACDC #400-13, The review team will include the SART and will include input from command staff as well as input from line supervisors, and other staff where practical. The SART will be inclusive of, but not limited to, the following members: The department's PREA Coordinator, designated mental health staff, staff first responders, designated medical staff, an OPA Investigator and a member of the command staff. A review of the incident review completed identified members as the ACDC PREA Coordinator, Facility Commander (Major Line Staff Supervisor), ACDC PCM/Accreditation Manager, OPA Investigator, Classification Unit Supervisor, Mental Health Supervisor, and Health Services Representative. Per an interview with the Chief of Corrections as he identified the aforementioned staff and upper-level management officials as members of the incident review team.</p> <p data-bbox="240 1514 1485 2078">115.86 (d) Pursuant to ACDC #400-13, The review team will; 1) Consider whether the allegation nor investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; 2) Consider whether the allegation or incident was motivated or otherwise caused by the perpetrator's or victim's race, ethnicity, gender identity, gay, lesbian, bisexual, transgender, or intersex identification, status or perceived status, or gang affiliation, or was motivated by other group dynamics at the facility. 3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area enabled the abuse. 4) Assess the adequacy of staffing levels in the area during different shifts. 5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. 6)Prepare a report of its findings, including, but not limited to, determination regarding the aforementioned and any recommendations for improvement, and submit such report to the Chief and PREA Coordinator. Interviews were conducted with the Chief of Corrections, ACDC PCM and the ACDC PREA Coordinator who serve as a member on the incident review. The ACDC PREA Coordinator identified the review team and considered all elements noted in the provision. The Chief of Corrections stated the incident review team conducts a review of ACDC policies, and procedures while reviewing and discussing what could have been done differently to prevent the incident from occurring. He added a full review of the occurrence would be completed while holding the aggressor accountable throughout the process to include receiving discipline and criminal charges as applicable. The incident reviews serve as a training tool for staff. The ACDC PCM confirmed she is a member of the incident review team and is involved in preparing the report of the findings from the reviews, while including any recommendations made by the review team.</p> <p data-bbox="240 2107 1485 2134">115.86 (e) Pursuant to #400-13, Incident reviews will be conducted to improve the effectiveness of the department's policies,</p>

practice, and training pertaining to sexual abuse prevention, detection, and response, the department's SART will review annually the data collected regarding sexual misconduct that has occurred within the department. This practice was confirmed by the ACDC Chief of Corrections and ACDC PCM.

Based on the review of ACDC policy, confirmation of the appropriate staff assigned to serve as the incident review team, training provided to the SART, members of the incident review team, interviews conducted with the Chief of Corrections, ACDC PREA Compliance Manager and ACDC PREA Coordinator (member of the incident review team), ACDC does meet all provisions of the standard.

115.87	Data collection
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 812 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 329 1417 645" style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13, Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities 3. Agency's website 4. Interviews: <ol data-bbox="242 557 636 645" style="list-style-type: none"> a. ACDC PREA Coordinator b. ACDC PREEA Compliance Manager <p data-bbox="242 674 1466 734">115.87 (a) (b) (c) (d) (e) (f) In accordance with ACDC #400-13, The department will collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p data-bbox="242 763 1102 792">The department will aggregate the incident-based sexual abuse data at least annually.</p> <p data-bbox="242 822 1430 882">The incident-based data collected will include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p data-bbox="242 911 1452 972">The department will maintain, review, and collect data as needed from all available, incident -based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p data-bbox="242 1001 1482 1061">Upon request the department will provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p data-bbox="242 1090 1485 1357">The agency has on its website https://www.atlantaga.gov/government/departments/corrections the most recent request Survey of Sexual Violence requested by the Department of Justice (2019). The review confirmed ACDC collected accurate, uniform data for allegations of sexual abuse at its facility using a standardized instrument and with set definitions per the standard provisions. The agency aggregates the incident-based sexual abuse data at least annually. ACDC utilizes the most recent version of the Survey of Sexual Violence (SSV) by the Department of Justice for the collection and report of data requested by the DOJ. ACDC does not contract with other facilities for the confinement of its detainees. The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p data-bbox="242 1386 1468 1514">Per an interview with the ACDC PREA Compliance Manager is she responsible for the collection of data and submitting it upon request. She added, upon not receiving notification from the DOJ for the 2020 survey, she contacted DOJ personnel and was advised the ACDC was not selected to submit a report. This notation is documented on the ACDC's website while identifying the 2021 survey is not available for review due not meeting completion requirements.</p> <p data-bbox="242 1543 1473 1637">Based on the review of ACDC policy, the agency's website, review of the agency's 2019 Survey of Sexual Violence Report, and interviews with the ACDC PREA Compliance Manger and ACDC PREA Coordinator, ACDC meets all provisions of the standard.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13, Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities 3. Agency website 4. Interviews: <ol style="list-style-type: none"> a. ACDC PREA Compliance Manager b. ACDC Agency Head <p>115.88 (a) (b) (c) (d) In accordance with ACDC #400-13, The department will ensure that data that is collected will be reviewed and aggregated to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: a) Identifying problem areas. B) Taking Corrective action on an ongoing basis, c) Preparing an annual report of its findings and corrective actions for the department.</p> <p>The annual report will include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the department's progress in addressing sexual abuse. The department's annual report will be approved by the Chief of Corrections and will be made readily available to the public through the department's page on the City of Atlanta's website at https://www.atlantaga.gov/government/departments/corrections . The departure may redact specific material from the report when publication may present a clear and specific threat to the safety and security of the department. The department will indicate the nature of the material that has been redacted. A review of the agency's website for the Annual Reports since the last PREA audit in 2018 was conducted. The review included Annual PREA Reports for 2019, 2020, 2021. The annual reports confirmed a comparison of each current year and prior year data and the redaction of information that may present a threat to the safety and/or security of the agency.</p> <p>Per an interview with the ACDC PREA Coordinator, the data is reviewed monthly and electronically maintained by the Office of Professional Authority, herself as the PREA Coordinator and the ADCD PREA Compliance Manager.</p> <p>An interview with the Agency Head confirmed he reviews and approves all annual reports completed by the PREA Compliance Manager prior to publication. He added upon receiving incident-based sexual abuse data, he reviews it carefully with an overlay of policy review, discussing the incidents with the SART, take in consideration of necessary changes that can be made to ensure non-reoccurrence of such incidents, in addition to providing training to staff during meetings, shift briefings, during walk-through, and emails.</p> <p>Based on the review of ACDC policy, the ACDC website with published Annual PREA Reports that includes a comparison of the current year's data with those from previous years, and interviews with the ACDC PREA Compliance Manager and ACDC Chief of Corrections/Agency Head, ACDC does meet all provisions of the standard.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. City of Atlanta Department of Corrections (ACDC) Completed Pre-Audit Questionnaire (PAQ) 2. ACDC #400-13, Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities 3. Interviews: <ol style="list-style-type: none"> a. ACDC PREA Coordinator b. ACDC PREA Compliance Manager <p>115.89 (a) In accordance with ACDC #400-13, The department will ensure data collected will be reviewed and aggregated to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: a) Identifying problem areas. b) Taking Corrective action on an ongoing basis, c) Preparing an annual report of its findings and corrective actions for the department.</p> <p>The annual report will include a comparison of the current years 'data and corrective actions with those from prior years and provide an assessment of the department's progress in addressing sexual abuse. The department's annual report will be approved by the Chief of Corrections and will be made readily available to the public through the department's page on the City of Atlanta's website. The department may redact specific material from the report when publication may present a clear and specific threat to the safety and security of the department. The department will indicate the nature of the material that has been redacted.</p> <p>The department's aggregated sexual abuse data will be made readily available to the public at least annually through the department's page of the City of Atlanta's website. Before making such data public, all person identifying information will be removed. The collected sexual abuse date will be securely stored and retained at least ten (10) years after the date of their initial collection.</p> <p>A review of the City of Atlanta's website confirmed the agency has placed the annual reports for review for the following years to include 2015 - 2021. The reports included a comparison of each current year and the most recent previous year. Per an interview with the PREA Coordinator, a review of the data is reviewed monthly while it is electronically maintained by the OPA Investigators, herself and the ACDC PCM. The facility's corrective actions measures are applied continuously on an ongoing basis.</p> <p>Per an interview with the ACDC PREA Compliance Manager she is responsible for the completion and submission of the data reports, and she ensures no personal identifiers are included in the report upon being publicly available. She also indicated the facility maintains the agency's data collected pursuant to 115.87 for at least 10 years after the date of the initial collection. A review of the agency's website confirmed all provisions of the standard were met by the ACDC and the annual reports from 2015 -2021 were publicly available on the agency's website at https://www.atlantaga.gov/government/departments/corrections. Therefore, based on the review of the ACDC policy, review of the ACDC's website and submitted annual reports with a comparison of each current year and the previous year, that did not include personal identifiers within the reports, it is determined, ACDC does meet all provisions of the standard.</p>

115.401	Frequency and scope of audits
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 1474 365">115.401 In accordance with ACDC #403-13, Responding to Detainee & Staff Sexual Misconduct: Introduction, Definitions & Responsibilities, to demonstrate compliance with PREA Standards, the department will be audited every three years on a schedule determined by the department's PREA Coordinator.</p> <p data-bbox="242 396 1490 490">This is the third year of the third audit cycle for ACDC. The ACDC is a standalone facility and has posted the PREA audits for the two previous audit cycles on its agency's website at https://www.atlantaga.gov/government/departments/corrections dated September 8, 2015, and September 27, 2018.</p> <p data-bbox="242 521 1458 647">The auditor was provided full access to all three floors and areas of the facility during the tour and throughout the site visit. Areas observed during the site visit included but was not limited to the following: arrival of detainees by local law enforcement, search procedures (thorough pat search only), intake, booking, risk screening, medical intake, housing units, designated housing unit recreation areas, shower areas, court appearance, and no cash self-bond releases.</p> <p data-bbox="242 678 1482 871">The OAS was used to complete the audit process with a review period of April 1, 2021, through March 31, 2022. The auditor was provided with copies of all requested documentation and information to include that stored electronically. The auditor requested and received sufficient sampling based on the size of the facility and detainee count, investigative reports, confirmation of background investigations, staff and detainee PREA training, medical, mental health, and investigators specialized training, detainee risk screenings, mental health referrals, and other documents. This information was uploaded in the OAS for review.</p> <p data-bbox="242 902 1485 1263">The auditor receive confirmation of the PREA Audit Notice Posting on April 29, 2022, and observed the notice posted throughout the facility upon entering the front entrance, on each floor upon exiting the elevator, booking and intake area, housing units, on-site courtroom, medical, mental health while being accessible to both staff and the detainee population. The site visit was conducted on June 7 -8, 2022. The notice was posted two days shy of six weeks prior to the site visit. The auditor advised the ACDC PREA Coordinator, the notice would be required to remain posted for an additional two days to meet the posting requirement. However, detainees are not normally housed at the facility beyond a week due the agency's Standard Operating Procedures, #200-36 Self-Bond Procedures that states detainees will be released pursuant to a procedure which is designed to ensure the elimination of payment of a bond to secure release from the ACDC for certain offenses outlined in Chapter 62 of the City of Atlanta Code of Ordinances. Specifically, the Atlanta Police Department only brings arrests with minor misdemeanor charges, no felony charges, who are awarded the opportunity to self-bond for release. The facility houses an average of 46 detainees daily.</p> <p data-bbox="242 1294 1485 1420">The auditor and non-certified support staff were provided office space to conduct all detainee and staff interviews in a private setting. Interviews were conducted with random and specialized staff. The detainee count of the first day of the site visit was 59. Due to no detainees housed at the facility during the site visit within the target group, none was available for interview. Therefore, the 16 detainees selected for the interview were randomly selected.</p> <p data-bbox="242 1451 1474 1576">An interview with staff assigned to the mailroom confirmed, all detainee mail is sealed prior to placement in the housing unit mailbox. Therefore, confidential outgoing information is available to the detainees. The auditor did not receive any confidential mail from ACDC staff and/or the detainee population. No detainees and/or staff requested to speak with the auditor.</p> <p data-bbox="242 1608 1326 1637">Based on the above, the facility has demonstrated substantial compliance with all provisions of this standard.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 210 453 237">Auditor Discussion</p> <p data-bbox="244 271 1477 365">115.403 This is the third year of the third audit cycle for ACDC. The ACDC is a standalone facility and has posted the PREA audits for the two previous audit cycles on its agency's website at https://www.atlantaga.gov/government/departments/corrections dated September 8, 2015, and September 27, 2018</p> <p data-bbox="244 396 1493 454">Based on the review of the ACDC's website that contains the agency's PREA reports for the previous two audit period cycles, ACDC has demonstrated compliance with this standard.</p>

Appendix: Provision Findings		
115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes

115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes

115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	na
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	no
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes

115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes